

Privacy statement of data processing activities related to video-surveillance (CCTV) at European Institute of Innovation and Technology Premises

This privacy statement provides detailed information on the management of personal data collected through video-surveillance system (CCTV) at the EIT main office premises (Infopark 1 Building E, Neumann Janos utca, 1117 Budapest, Hungary).

The processing of personal data of the data subjects follows the provisions of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC¹ (hereinafter “the Data Protection Regulation of the European Institutions”).

What is personal data and what is a personal data processing operation?

Personal data shall mean any information relating to an identified or identifiable natural person (“data subject”). An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, and identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Who is the data controller?

The data controller is the **Head of Administration Unit of EIT**.

What is the purpose of the personal data processing?

The purpose of the personal data processing is to ensure security and access control in the premises of the EIT by means of the video-surveillance. The electronic surveillance system allows direct observation, in which images and sound are being monitored and recorded.

The system is not used for any other purpose, for example, it is not used to monitor the work of employees or to monitor attendance. Neither is the system used as an investigative tool (other than investigating physical security incidents such as thefts or unauthorised access). It is only in exceptional

¹ OJ L 295, 21.11.2018, p. 39-98



circumstances that the images may be transferred to investigatory bodies in the framework of a formal disciplinary or criminal investigation.

Who are the data subjects?

EIT staff (temporary agents, contractual agents, interims, SNEs, trainees), external visitors, maintenance, couriers and any other third party entering the monitored area.

What types of personal data are processed?

The video - surveillance system at the EIT premises captures **images and sounds within monitored areas**, which include commonly accessible spaces (e.g., near elevators, passages), that are clearly marked with specific pictograms containing both images and text.

The location of the cameras was carefully reviewed to ensure that they minimise the monitoring of areas that are not relevant for the intended purposes. CCTV conducts monitoring on a limited scale (no facial recognition, coverage limited to entry/exit points, only on-premises, not in public space). Areas with heightened expectations of privacy, such as toilet facilities, leisure areas, individual and shared offices, and open-plan workspaces, are not subject to monitoring.

The video surveillance system is not designed to capture, target, or process images revealing “special categories of personal data” as defined under Article 10 of Data Protection Regulation of the European Institutions.

While the primary purpose of the CCTV system is not to process such data, information related to ethnic or racial origin may be inadvertently captured. In such cases, the processing of this data is permitted under the exception outlined in paragraph 2(g) of Article 10 of the Data Protection Regulation of the European Institutions for reasons of substantial public interest, namely in the premises of EIT.

Who has access to the personal data (data recipients)?

Within the EIT:

The personal data of data subjects are processed by authorised EIT staff on a need-to-know basis, specifically the Local Security Officer (LSO) and the Deputy LSO.

The CCTV system operates autonomously, and no continuous monitoring or processing of data occurs. Access to and processing recorded data is only carried out upon authorisation by the EIT Director or the Head of Administration.

Access to the personal data may be given to the Internal Control Coordinator of the EIT by request of the EIT Director if necessary and justified for the performance of the duties of the Internal Control.

Access to the personal data also may be given to the EIT Legal officers in context of administrative inquiries and/or disciplinary proceedings.

Within the Commission and EU institutions and bodies:

The access to personal data may be granted to the Internal Audit Service of the Commission, Legal Service, OLAF upon request and only if necessary, in the context of official investigations or for audit purposes.

For the purpose of handling review procedures and litigation, access to the personal data may be granted to the European Ombudsman, the European Data Protection Supervisor, the General Court and the European Court of Justice upon request and to the extent necessary for handling the review procedure and litigation.

Third parties subject to the GDPR² and third parties not subject to the GDPR:

Exceptionally, and only, if necessary (e.g., in the event of a security incident), personal data collected through video-surveillance at the EIT premises may be disclosed to the relevant investigative or judicial authorities of the Member State in which the EIT premises are located.

Exceptionally, and if necessary, personal data related to video-surveillance of the EIT premises (e.g. in case of investigations of criminal offences) may be disclosed to law firms. The respective data recipient will handle your personal data in accordance with the instructions of the Data Controller (EIT). The agreement between the parties will include relevant provisions regarding data protection.

What are the rights of the data subjects?

In accordance with Articles 15, 17, 18, 19 of the Data Protection Regulation of European Institutions the data subjects have the **right for information**, the **right of access**, the **right of rectification** in case their personal data is not complete or not accurate and the **right to erasure** ("right to be forgotten").

The data subjects have the right to obtain the **erasure** of their personal data in accordance with Article 19 of the Regulation and in particular in the cases when the personal data are no longer necessary in relation to the purposes for which they were collected, if the data subject withdraws its consent, or in case of unlawful processing.

Data subjects have also the **right to restriction** of processing of personal data in accordance with Article 20 of the Regulation, and the **right to object** on grounds listed in Article 23 of the Regulation.

The rights can be only exercised by sending a request in a written form to the EIT-Buildingmanagement@eit.europa.eu (the Data Controller representative). As a general rule, the requests for information, access, rectification, erasure restriction are handled without undue delay and in any event within one month of receipt of the request; this period may be extended by further two months where necessary, taking into account the complexity and number of requests. In case the data

² Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)



subject contests the accuracy of the data, upon request, the data is restricted immediately for the period of verification of the accuracy of the data, not exceeding one month.

Restrictions to the rights of data subjects may be applied by the EIT, in accordance with Article 25 of the Data Protection Regulation of the European institutions and the EIT internal rules on restrictions.

Who should be contacted in case of queries or complaints?

The data subjects have the right of recourse at any time to the Data Protection Officer of the EIT (EIT-DPO@eit.europa.eu) and to the European Data Protection Supervisor (EDPS@edps.europa.eu) for matters relating to the processing of their personal data.

For how long the data is retained?

Any video and sound footage captured by the camera system at the monitored area of the EIT premises will be stored and retained for a maximum of **30 days** from the date of the recorded event. **After this period, the data is deleted automatically.** In case of an open investigation, a copy of the footage will be made and stored until the investigation is closed.

What is the legal basis of the processing?

General legal basis:

- Regulation (EU) 2021/819 of the European Parliament and of the Council of 20 May 2021 on the European Institute of Innovation and Technology (recast) (“EIT Regulation”)³

Specific EIT legal basis:

- Decision 49/2024 of the Director of the European Institute of Innovation and Technology (EIT) on the Security Policy of the EIT⁴

Grounds for lawfulness:

In line with Article 5.1. (a) of the Data Protection Regulation of the European institutions, processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body.

³ OJ L 170, 12.5.2021, p. 1.

⁴ Ref.Ares(2024)9091508 – 18/12/2024