



Schola Europaea

European School of Mol

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## Privacy Statement – Video Surveillance

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The European School of Mol (hereinafter, the “School”) is committed to respecting your privacy and to complying with the requirements of the 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 on the free movement of such data (hereinafter, “the GDPR”) and the requirements of the law of 21 March 2007 regulating the installation and use of surveillance cameras (Camera Act).

‘Personal data’ means any information related to an identified or identifiable natural person. The ‘data subjects’ are any persons accessing the School grounds (i.e. visitors, pupils, parents, School’s staff members, external service providers contracted by the School).

As defined by Article 4 (7) of the GDPR, the ‘controller’ is the natural or legal person, public authority, agency or other body which alone or jointly with others, determines the purposes and means of the processing of personal data. The director of the School<sup>1</sup> is considered to be the ‘controller’.

This Privacy Statement informs you about how the School processes information it collects about you with video surveillance. It sets out what kind of personal data it may collect about you, how it processes them, and what are your rights in relation to such collection.

### **1. What are the categories of personal data collected by the School?**

The categories of data that are collected and processed are the following:

- The images captured by the cameras (no sound is recorded).

### **2. What are the purposes for which personal data are collected?**

The School collect, use, store and process your personal data:

- To ensure a safe environment in the School by preventing, identifying or detecting any offences or incivilities against people or property that violates the law and/or School’s policy;
- To assist in search of lost or missing child;
- To record images of a given location at a given time for identification of individuals in the event of vandalism and/or offences at School.

The video surveillance is not used for any other purposes, such as to monitor the work of employees, their attendance or in combination with automatic identification features (i.e. facial recognition or automatic tracking technologies).

### **3. What is the legal basis for the processing of personal data?**

The School uses the video surveillance in its legitimate interest of ensuring the security, safety and protection of individuals and property on the School grounds. Thus, the legal basis for the processing of your personal data relies on article 6, paragraph 1, numeral (f) of the GDPR: “Necessary for legitimate interests of controller or 3<sup>rd</sup> party”.

The use of the video surveillance is also subject to the requirements of the law of 21 March 2017 regulating the installation and use of surveillance cameras (Camera Act).

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<sup>1</sup> Contact details: [mol-director@eursc.eu](mailto:mol-director@eursc.eu)

#### **4. Who has access to the personal data and whom do we share them with?**

Personal data collected by the School will be processed within the School and not disclose outside of the European Union.

Only staff members with a legitimate interest in accessing the surveillance cameras and images will process your data. These persons are bound by an internal procedure for accessing and viewing surveillance camera images and are committed to protecting the confidentiality of your personal data. They also received data protection training in order to act in accordance with the GPR's provisions.

The School's security guards will not have access to the images or real-time viewing of images.

The video recordings may be shared with the judicial or law enforcement authorities when required by law for the purpose of ongoing inquiries or to investigate or prosecute criminal offences.

#### **5. How long do we keep your personal data?**

The images are kept for a maximum of one month (30 days)<sup>2</sup>. Images older than one month will be automatically overwritten by news images.

If the images can contribute to the proof of an offence, a damage or a security incident, it may be retained for the duration of the investigation in accordance with the law of 21 March 2007 regulating the installation and use of surveillance cameras (Camera Act).

#### **6. Where are the cameras installed?**

The cameras locations and viewing angles are based on a methodical risk analysis, which ensures that cameras are only directed at the most relevant locations inside and outside the buildings.

Cameras are installed inside the School's perimeter as well as in the School's buildings. The cameras are mainly installed at the School's entrances, perpendicular to the building's entrances/exits, in the corridors and halls and in alignment with pupil's storage locker to prevent any damages or any thefts.

The cameras are not installed in private areas (i.e. restrooms, changing rooms, classrooms, offices, swimming pool or other areas in which there is a reasonable expectation of privacy).

#### **7. What steps are taken to safeguard your personal data?**

In order to protect data subjects' personal data, a number of technical and organisational measures have been put in place. These include appropriate measures to address online security, physical security, risk of data loss, alteration or unauthorised access, taking into consideration the risk represented by the processing and the nature of the data being protected.

#### **8. What are your rights?**

With respect to the processing of our personal data, you have the right to be informed and to access your personal data. You also have the right to rectification, to erasure and to object the processing.

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<sup>2</sup> The cameras are functioning 24/7, however the images only recorded when motion is detected in the monitored areas.

To facilitate the exercise of your rights, you can contact our Data Protection Officer [MOL-DPO-CORRESPONDENT@eursc.eu](mailto:MOL-DPO-CORRESPONDENT@eursc.eu)

The School will response to these requests without undue delay and within one month at the latest. Should the School decline to comply with a request, you will be informed of the reasons for such decision.

## **9. Whom to contact**

If you consider that the School has not complied with the data protection laws applicable (including the GDPR) or that your rights have been infringed as the result of the processing of your personal data, you have the right of recourse and can contact the [National Supervisory Data Protection Authority](#).

## **10. Changes to this Privacy Statement**

We reserve the right to update this Privacy Statement at any time, and we will provide you with a new Privacy Statement when we make substantial changes.

Last update: April 2023.

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