



EMA/351947/2021

## Record of data processing activity (public)

Name and reference number of processing operation: Video-surveillance (CCTV) system

1.	Last update of this record, version number:	3 January 2024 Version 4
2.	Reference number:	A 38
3.	Name and contact details of controller:	European Medicines Agency Internally: Head of the Administration and Corporate Management Division Contact: <a href="mailto:DataController.Administration@ema.europa.eu">DataController.Administration@ema.europa.eu</a>
4.	Name and contact details of DPO:	<a href="mailto:dataprotection@ema.europa.eu">dataprotection@ema.europa.eu</a>
5.	Name and contact details of joint controller (where applicable)	Not applicable
6.	Name and contact details of processor (where applicable)	<b>SECURITAS BEVEILIGING B.V.</b> (EMA Security provider) De Corridor 3A 3621 ZA Breukelen Email: <a href="mailto:dataprotectionofficer@securitas.nl">dataprotectionofficer@securitas.nl</a>  <b>DS6</b> (Building CCTV systems maintenance provider) Address: DOMENICO SCARLATTI V.O.F. Graafsebaan 65, 5248JT Rosmalen Post address: Postbus 246, 5240AE Rosmalen Email: <a href="mailto:EMA-maintain@heijmans.nl">EMA-maintain@heijmans.nl</a>
7.	Purpose of the processing	The purpose of this data processing activity is to operate the Agency's video-surveillance (CCTV), in order to protect EMA premises against unauthorised access and theft, as well as against both external and internal threats. The video-surveillance system is exclusively operated for the purpose of safety and security of people, building and assets. It is part of the measures taken pursuant to the broader EMA security policy and helps to deter, detect and if necessary, investigate



		<p>unauthorised physical access to premises, including unauthorised access to secure areas and protected rooms, IT infrastructure, and operational information. In addition, the system helps prevention, detection and investigation in case of theft of equipment and assets owned by the Agency, visitors or staff as well as of threats to the safety of personnel working at the office. It can also be used in situations when accidents or health &amp; safety related incidents are investigated.</p> <p>As per the rules for reimbursement of expenses for delegates attending meetings, EMA must certify delegate's presence at the meeting to proceed with the reimbursement of expenses related to their participation at meetings. During the external meetings, presence is certified by going physically to the meeting rooms and ticking the official list of participants once the delegate has been identified. The Meetings Support Service team has extended the face-to-face identification process with the use of CCTV tools to confirm the participation of delegates at meeting. This process has reduced disturbance during the meetings, provided more accuracy and efficiency as regards to the use of the resources within the MSS team.</p> <p>In exceptional and occasional cases, where this is necessary and proportionate as documented in a decision of the relevant Internal Controller(s), the Agency reserves the right to use the system as an investigative tool or to obtain evidence in internal investigations or in disciplinary procedures and to submit video evidence that has been obtained during an investigation, or may have been recorded during normal operation of the system to substantiate allegations of criminal activity, gross misconduct, or behaviour which puts others at risk. Furthermore, the Agency may be required to provide evidence, e.g. recordings from the CCTV system, to law enforcement authorities i.e., Dutch Police or OLAF that may investigate criminal events. The data subjects identified in the recording will be individually notified about such data processing, unless a restriction is established in accordance with the <i>Decision of the Management Board of the European Medicines Agency of 12 June 2019 on internal rules concerning restrictions of certain rights of data subjects in relation to processing of personal data in the framework of the functioning of the Agency</i>.<sup>1</sup></p> <p>Additional on purpose cameras could be installed in preventative manner for ensuring investigation capability during specific events held at the Agency, as well as in the framework of criminal investigations or enquires conducted within the remit of Implementing Rules on the conduct of administrative inquiries and disciplinary procedures.</p> <p>Information about the ad-hoc surveillance is provided by on-</p>
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<sup>1</sup> Published in the Official Journal of the European Union: [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L\\_.2019.209.01.0019.01.ENG&toc=OJ:L:2019:209:TOC](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2019.209.01.0019.01.ENG&toc=OJ:L:2019:209:TOC)

		<p>the-spot notice and in a specific data protection notice published on the Agency's intranet or website, as necessary. The system is not used for any other purpose, specifically, it is not used to monitor the work of employees or to monitor attendance.</p>
8.	Description of categories of persons whose data EMA processes and list of data categories	EMA staff members (including interim and trainee staff) contractors, delegates & visitors entering the EMA premises including building, perimeter grounds.
9.	Time limit for keeping the data	<p>The images are stored for a maximum of 28 days. Thereafter, all images are overwritten. If any image needs to be stored to further investigate or evidence a security incident, they may be retained only as long as necessary for the specific purpose. Their retention is rigorously documented and the need for retention is regularly reviewed, at least every 3 months.</p> <p>The system is monitored live by the security guards and supervisors within the security control room 24 hours a day.</p>
10.	Recipients of the data	<p>The data collected will be processed internally by staff within the EMA Division responsible for Administration and Corporate Management. A limited number of authorised security staff members and security contractors have access to live images and a further restricted group only has access to recordings including the Head of Facilities Support. EMA Meeting Support Services team can access the live viewing to mark the presence of external delegates during the meeting organised in EMA meeting rooms.</p> <p>The maintenance staff responsible for technical maintenance of the systems have access to all the system components, including recordings, exclusively for maintenance purpose. In exceptional circumstances, exclusively in the case of administrative investigations, information may be disclosed to:</p> <ul style="list-style-type: none"> <li>• the Head of the Administration and Corporate Management Division;</li> <li>• and to the persons who are formally appointed as investigators in the framework of administrative inquiries and the secretary and members of disciplinary boards.</li> </ul> <p>Information may also be disclosed to:</p> <ul style="list-style-type: none"> <li>• the European Anti-Fraud Office (OLAF);</li> <li>• and / or national law enforcement authorities;</li> <li>• and/ or the DG Security, European Commission,</li> <li>• in the context of crime prevention or investigations regarding threats to EMA security.</li> </ul>
11.	Are there any transfers of personal data to third countries or international	N/A

	organisations? If so, to which ones and with which safeguards?	
12.	General description of security measures, where possible.	The Agency has appropriate technical and organisational measures in place, including organisational policies, to safeguard the security of personal data captured by the CCTV system and to ensure the confidentiality, integrity and availability of the relevant systems, services and the personal data processed within them. In particular, limited specified staff and nominated contractors have access to the databases.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	Details concerning the processing of your personal data are available on the Agency's website at: <a href="https://www.ema.europa.eu/en/about-us/legal/general-privacy-statement">https://www.ema.europa.eu/en/about-us/legal/general-privacy-statement</a> Here you may find the privacy statement on this specific processing activity as well.