



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

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Executive Director
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Video surveillance policy

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1. Introduction and purpose

This policy, along with its annexes, describes the scope and purpose of the European Medicines Agency (hereinafter “EMA” or “the Agency”) video-surveillance system (CCTV) and the safeguards adopted by the Agency to protect the personal data, the right to privacy and other fundamental rights and legitimate interests of individuals filmed by the system’s cameras. It was first adopted in July 2011 and has been revised on a regular basis.

The systematic automated monitoring of some spaces by means of a video-surveillance system is exclusively operated for the purpose of protecting the safety and security of people, and of EMA’s building and assets. It is part of the measures taken pursuant to the broader EMA’s security policy and helps to deter, detect and, if necessary, investigate 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, if necessary, investigation in case of theft of equipment and assets owned by the Agency, visitors, staff and threats to the safety of personnel working at the office.

It can also be used in situations when accidents or health & safety related incidents are investigated.

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 CCTV system to examine events that have occurred, to gather evidence as part of an administrative enquiry¹ or to assess behaviours which put 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 *Decision of the*

¹ Implementing Rules on the conduct of administrative inquiries and disciplinary procedures.



*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.*²

The system is not used for any other purpose. Specifically, it is not used to monitor the work of employees/contractors or to monitor attendance.

2. Scope

The scope of this policy concerns the video surveillance system used at EMA in the context of prevention and detection of crime and misconduct, as well as Health and Safety incidents investigation.

The video surveillance system records and stores all movements in the areas that the cameras monitor, 24 hours a day and 7 days a week, unless otherwise indicated. Areas monitored by the system are described in paragraph 4.1.1.

It applies to all individuals working at the Agency and others visiting the building for other reasons than attending the workplace.

Video-intercom entry systems, video conference systems, and recording of images for documentary purposes at events such as conferences or training courses are not covered by this policy.

3. Definitions

Agency Headquarters	Includes the EMA building at Domenico Scarlattilaan 6, 1083 HS Amsterdam and perimeter grounds under the scope of the Lease Agreement.
CGREA	The Central Government Real Estate Agency of The Netherlands
CCTV	Closed Circuit Television, (cameras, screens, server where images are stored)
DPO	Data Protection Officer
EC	European Commission
EDPS	European Data Protection Supervisor
EDPB	European Data Protection Board
Guidelines	EDPB Guidelines 03/2019 on processing of personal data through video devices
IP	Internet Protocol
IT	Information technology
OLAF	European Anti-Fraud Office
External storage media	It is a device used to store digital data outside of a computer or network and is easy to transport. (e.g. flash drive, external hard disk)
Ad-hoc video-surveillance	Refers to the surveillance using video camera(s) in a specific location, for a limited period of time, for duly justified purposes

² 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

4. Policy statement

This Policy seeks to ensure that the video surveillance system (CCTV) installed and in use at the European Medicines Agency is used exclusively for the sole purpose of helping to ensure the safety and security of people at the Agency and its property and information. It is operated in compliance with most current data protection regulations and best practices.

4.1. System description and organizational measures

4.1.1. Summary system description and areas under surveillance

The video-surveillance is operated through a segregated IT network which is also protected by a firewall and by passwords. The system records 24h continuously and can be monitored within the security control room where video walls and a series of monitors are installed to enable the viewing of multiple cameras.

Fields of View

The location of cameras and selected fields of view have been carefully selected to minimize viewing areas that are not relevant for the intended purposes.

Indoors, the system only monitors entry and exit points to the building (including emergency exits), entry and exit points within the building connecting different areas which are subject to different access rights and separated by locked doors or another access control mechanism, areas containing sensitive information or where sensitive information may be exposed or discussed, entrances to restricted areas such as those containing valuable equipment or vital building infrastructures.

Outside the building, it monitors the plot perimeter, including the main entrance forecourt, the South pavement, the expedition road, loading bay area, the East sidewalk and the West alley and parking slots.

A map with the locations of the cameras is included in Annex I.

Number of cameras

During the design phase of the Agency Headquarters, prior to installation of a video surveillance system, the number of cameras was examined in order to install as few as possible to achieve the legitimate goal in view.

A description of the cameras and system is included in Annex II.

Technical specifications

The type of each camera was also chosen according to the degree of precision required for the goal in view. Most of the cameras used are fixed cameras.

The Agency does not monitor any areas under heightened expectations of privacy such as office space, meeting and conference rooms, leisure areas or toilet facilities.

Retention period

The CCTV images are kept in the system for 28 days, before being overwritten with new recordings³.

³ Due to system technical aspects, in particular related with automatic overwrite of recordings on the servers, in some cases footage can be stored above the 28th days retention period, for up to maximum 1 hour.

4.1.2. Privacy-friendly technological solutions

The Agency has implemented the following privacy-friendly technological solutions:

- Video integrity verification
- Segregated LAN
- HTTPS protocol
- Encryption
- Export of images restricted
- Audit trail of system transactions by users.

4.1.3. Confidentiality undertakings

Any person who has access to video surveillance footage or who has been authorised to carry out work on such images, specifically, staff members of firms supplying security services or maintenance services for video surveillance installation, who are likely to see video surveillance footage, must sign a confidentiality undertaking.

4.1.4. Ad-hoc surveillance

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.

The Agency's Facilities support service (A-ST-FSS) security staff keeps a register of the locations and usage periods involved, as well as the file reference for the relevant investigation.

When ad-hoc video surveillance needs to be implemented, authorisation from the Executive Director and the Agency's Data Protection Officer, should be requested by A-ST-FSS security staff upon endorsement of the Head of Facilities Support Service.

In addition, information about the ad-hoc surveillance is provided by on-the-spot notice and in a specific data protection notice published on the Agency's intranet or website, as necessary.

Ad-hoc surveillance, without a notice, is documented and notified in case by case basis in accordance with the *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*⁴.

4.1.5. How does the Agency provide information to the public

The Agency provides information to the public about the presence of video surveillance system in a multi-layer approach, which consists of a combination of the following methods:

- On-the-spot notices (warning signs) to alert the public to the fact that monitoring takes place and provide to them with essential information about the processing and clearly referring to a second layer of information (e.g. Privacy Statement); and

⁴ 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

- A Privacy Statement and record for the Central register of data processing records are published on the EMA corporate website.
- The Agency posts a public version of the video-surveillance policy on the EMA website, and a full version on the EMA intranet.
- A warning is included in the reverse of access cards.
- Information is included in the security brochure available for visitors and staff
- Print-outs of the public version of this video-surveillance policy and of the Privacy Statement are available at reception and from the security staff upon request.
- Contact details are provided in the Privacy Statement and record for the central record for further enquiries.

4.1.6. Transparency

The video-surveillance policy is available to public. The confidential technical annexes are restricted to limited staff members for security reasons.

4.1.7. Specific individual notice

Individuals are given specific individual notice if they are identified on camera (for example, by security staff in a security investigation) provided that one or more of the following conditions apply:

- Their identity is noted in any files/records;
- The video recording is used against the individual;
- Video recordings kept beyond the regular retention period;
- Video recordings transferred outside the A-ST-FSS security; or
- If the identity of the individual is disclosed to anyone outside the A-ST-FSS security.

Provision of notice may sometimes be delayed temporarily, for example, if it is necessary for the prevention, investigation, detection and prosecution of criminal offences, in accordance with the procedure established by *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*⁵.

The Agency's DPO is consulted in all such cases to ensure that the individual's rights are respected.

4.2. Data Protection

The video-surveillance system (CCTV) is designed, installed and operated in accordance with Regulation (EU) 2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies.

The system is part of the building installations provided by the landlord of EMA building, the CGREA, to the tenant, the Agency. The compliance of the system with national data protection legislation was confirmed to the Agency in a memorandum dated 14 September 2019.

⁵ 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

The system also takes into account best practices and recommendations as set out by the European Data Protection Supervisor (EDPS) in the EDPS Video-Surveillance Guidelines⁶, as well as the European Data Protection Board (EDPB) Guidelines (Guidelines 03/2019 on processing of personal data through video devices).

The EMA video surveillance system is designed and implemented through technical solutions that ensure the compliance with data protection obligations. Moreover, organisational measures are in place to restrict access to the CCTV images. Only a limited number of authorised security staff members and security contractors have access to live images and recordings as presented in Annex 5 of this Policy. These organisational measures are meant to mitigate the risk to rights and freedom of natural persons, resulting for example from accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access to video surveillance data.

Additionally, there is a regular review of roles and responsibilities for operators, system administrators and technical engineers with access to the system in order to keep this updated and ensuring that access to footage is only granted where strictly necessary.

All persons with access rights to the CCTV images, including the security guards, and maintenance contractors must be given data protection training and sign a confidentiality agreement before being authorised to operate the system.

5. Related documents

[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](#)

Annex 1 Floor maps of the locations of cameras (Confidential)

Annex 2 Technical specifications for the cameras and for the video-surveillance system, including any software and hardware (Confidential)

Annex 3 Confidentiality undertakings template (Internal)

Annex 4 Register of retention and transfer (Confidential)

Annex 5 CCTV access levels (Internal)

Annex 6 [Record of Data Processing](#)

Annex 7 [European Medicines Agency's Privacy Statement for the operation of Video-surveillance \(CCTV\) system](#)

6. Changes since last revision

- Updated provisions of Section 4.2 to reflect the possibility for contracted security guards stationed in the Agency's Security Control Room to access CCTV recording in the framework of security incident response.
- Update of Annex 5 in accordance with previous point.
- Inclusion of CGREA acronym definition in Section 3.

⁶ https://edps.europa.eu/sites/default/files/publication/10-03-17_video-surveillance_guidelines_en.pdf

- Minor wording refinement and removal of reference to “car parking” under “Agency Headquarters” definition.

Amsterdam,

[Signature on file]

Emer Cooke
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