

## SPECIFIC PRIVACY NOTICE – Video-Surveillance at the SESAR 3 JU

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Images on individuals captured by the CCTV camera system of SESAR 3 JU constitutes personal data, the processing of which shall comply with Regulation 2018/1725<sup>1</sup> (the “Regulation”).

### What is the purpose of the personal data collection?

The SESAR 3 JU operates the video-surveillance system for controlling the access to its premises and for ensuring the safety and security of buildings, assets, staff and visitors. The Video-surveillance Policy of the SESAR 3 JU describes the CCTV system and the safeguards we take to protect the personal data, privacy and other fundamental rights and legitimate interests of those caught on the cameras.

### Which kind of personal information is collected?

Images of persons and objects captured in live monitoring, operating 24 hours per day, 7 days per week and stored in video-footage records of the SESAR 3 JU Video Surveillance system, from which individuals are recognisable in a direct or indirect manner (e.g. identification from images in combination with other information).

### What is the legal basis of the processing?

The use of the SESAR 3 JU video-surveillance system is necessary for the management and functioning of the SESAR 3 JU (for the security and access control purpose). Moreover, processing is based on the *Rules governing the use of Video-surveillance within the SESAR Joint Undertaking* adopted with the Executive Director’s decision SJU/ED/758. Therefore, in accordance with Article 5(1)(a) of the Regulation 2018/1725, the SESAR 3 JU has a lawful ground for the video-surveillance.

### Actors in the data collection

Controller: The SESAR 3 JU, Avenue Cortenbergh 100, 1000 Brussels

Processors: For certain parts of the processing activity, the SESAR 3 JU entrusts the following external service providers the processing of personal data for the purpose of security surveillance services:

- Protection Unit SRL ([privacy notice](#)) provides the security guards and support with the monitoring of the surveillance cameras.
- Securitas S.A. ([privacy notice](#)) is the system administrator of the video-surveillance system.

### How is SESAR 3 JU processing your personal data?

The video-surveillance system is a conventional static system. It records images detected by the cameras in the area under surveillance, together with time, date and identification of the camera location.

Images of persons and objects are stored in video-footage records of the SESAR 3 JU Video surveillance system. The SESAR 3 JU uses its video-surveillance system for the sole purposes of security and access control. 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.

A detailed description of the processing is provided in the Rules governing the use of Video-surveillance within the SESAR Joint Undertaking available [here](#).

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<sup>1</sup> [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/EC](#)

## How do we protect and safeguard your information?

- Password protection, secure rooms and accredited security guards.
- All SESAR 3 JU staff/all personnel with access rights have undertaken a data protection training.
- Network firewalls in order to protect the logic perimeter of the IT infrastructure have been installed.
- All staff (internal and external) with access rights signed a non-disclosure and confidentiality form.
- Only the system administrator, specifically appointed and by order of the SESAR 3 JU for this purpose, is able to grant, alter or annul any access rights of any persons

## Who has access to your information and to whom is it disclosed?

Access rights are limited to a small number of clearly identified individuals on a strictly need-to-know basis. Authorised users can access only those personal data to which their access rights refer:

- Recorded video: only available to the following staff: Executive Director, Local Information Security Officer (LISO), Local Security Officer (LSO), Chief Administration Affairs, Facilities & Support Services, staff members and our processor Securitas
- Live video (real-time viewing):
  - Partly, only available to the above listed persons and to the security guard when on-site from 17h00 onwards Monday – Thursday and 16h00 onwards on Friday.
  - Partly available to the LISO, LSO, the system administrator and the accredited security guard when on-site from 17h00 onwards Monday – Thursday and 16h00 onwards on Friday.

The security guards on site have no access to the recorded video.

In case of security incidents or inquiries thereto, access to the CCTV footage may be transferred and disclosed to other persons. All transfers and disclosures outside the SESAR 3 JU recipients indicated above are possible only after permission of the Local Security Officer, and consultation of the Data Protection Officer, and such transfers are documented in a specific register. Each transfer is subject to a rigorous assessment of the necessity of such transfer and the compatibility with the initial security and access control purpose.

Under these circumstances, access may be given to:

- Local police or, if needed, to investigate or prosecute criminal offences.
- The European Anti-fraud Office (OLAF) in the framework of an investigation carried out by OLAF, the investigation panel, or the disciplinary board in the framework of an administrative inquiry or disciplinary proceeding, under the rules set forth in Annex IX of the Staff Regulations, provided that it can be reasonably expected that the transfers may help the investigation or prosecution of a sufficiently serious disciplinary or criminal offence.

## What are your rights and how can you exercise them?

Members of the public have the right to access the personal data the SESAR 3 JU holds on them and to correct and complete such data. Any request for access, rectification, blocking and/or erasing of personal data should be directed to the Facilities & Support Services responsible for security matters at the following address: [sju.security@sesarju.eu](mailto:sju.security@sesarju.eu). The SESAR 3 JU DPO may also be contacted in case of any other questions relating to the processing of personal data.

Information on action taken on the data subject's request to exercise her/his rights shall be provided without undue delay and in any case within one month of receipt of the request. In case of complex or voluminous requests, this period may be extended by another two months, in which case the JU will inform the data subject.

If specifically requested, a viewing of the images may be arranged or the applicant may obtain a copy of the recorded images on a DVD or other media. In case of such a request, the applicants must indicate their identity beyond doubt (e.g. they should bring identity cards when attending the viewing) and, whenever possible, also designate the date, time, location and circumstances when they were caught on cameras. They must also provide a recent photograph of themselves that allows the SESAR 3 JU to identify them from the images reviewed.

Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the SESAR 3 JU may refuse to act on the request.

Possible restrictions as laid down in Article 25 of the Regulation and the dedicated SESAR 3 JU decision on Restrictions may apply to the above rights. For example, following a case-by-case evaluation we may have to conclude that restricting access may be necessary to safeguard the investigation of a criminal offence. A restriction may also be necessary to protect the rights and freedoms of others, for example, when other people are also present on the images, and it is not possible to acquire their consent to the disclosure of their personal data or to use image-editing to remedy the lack of consent.

Please note that on-the-spot notices with the CCTV pictogramme mark the areas within the SESAR 3 JU building perimeter covered by the video surveillance.

In case of queries or complaints, please contact:

- The relevant unit at the SESAR 3 JU responsible for security aspects, the Facilities & Support Services at the following address [sju.security@sesarju.eu](mailto:sju.security@sesarju.eu), and/or
- The SESAR 3 JU DPO ([sju.data-protection@sesarju.eu](mailto:sju.data-protection@sesarju.eu))

In addition, every individual has the right of recourse to the European Data Protection Supervisor ([edps@edps.europa.eu](mailto:edps@edps.europa.eu)) if they consider that their rights under the Regulation have been infringed as a result of the processing of their personal data by the SESAR 3 JU.

Before doing so, the SESAR 3 JU recommends that individuals first try to obtain recourse by contacting the addresses indicated in the first paragraph of the present section.

Staff members may also request a review from their appointing authority under Article 90 of the Staff Regulation.

### **For how long the data is retained?**

The images are retained for a maximum of **thirty calendar days**.

### **Complaints, concerns and recourse**

Any complaint or concern shall be addressed to the data protection officer of the SJU: [sju.data-protection@sesarju.eu](mailto:sju.data-protection@sesarju.eu) and the Corporate Support Unit at [sju.security@sesarju.eu](mailto:sju.security@sesarju.eu).

Data subjects have a right to recourse to the European Data Protection Supervisor (EDPS) at any time [edps@edps.europa.eu](mailto:edps@edps.europa.eu)

### **Additional information**

More information on Data Protection at the SESAR 3 JU can be obtained in the SESAR 3 JU [register of data processing operations](#) and in the privacy notices published in the SESAR 3 JU web site. This privacy notice is available in the SESAR 3 JU [website](#) and at the SESAR 3 JU reception desk.