

## Information note

about processing of personal data through video devices

### Global Relocation Service

Due to Regulation UE 2016/679 about protection of personal data which ensure a consistent level of protection for natural persons throughout the Union and to prevent divergences hampering the free movement of personal data within the internal market. It concentrates transparency for the data subject and makes the controller responsible for the way he processes personal data.

#### **The purpose of processing through video devices**

Global Relocation Service processes personal data, respectively the image, through video systems with the purpose of monitoring the access of persons in Global Relocation Services headquarters, of assuring the security of spaces and assets and the safety of the persons inside the headquarters.

Because processing of personal data (image) through video devices is mandatory, the refusal of a person to provide this kind of data means that individual does not have access inside the headquarters.

#### **Legal grounds**

Processing of personal data through video devices, installing and using technical equipment and other types of similar components is made with the following legal provisions:

- Regulation nr.679/2016 for protection of personal data
- Decision nr.52/2012 for processing of personal data through video devices
- Law nr. 333/2003 for guarding objectives, assets, values and individuals
- Order nr. 52/2002 for approving of minimum criteria of personal data security

As it is specified in art.13, (2) in Decision nr.52/2012, processing of personal data through video devices is made only through authorized persons by the controller.

#### **The video-surveilled areas**

The location of video cameras was made in compliance with recent legislation. There is no surveillance in private areas ( offices where the public does not have access or bathrooms). Exceptionally, in case of justified necessity, video devices may be installed where employees work, but only after making an impact evaluation and after informing the Data Protection Officer. In these cases, the provisions of art.8 from Decision nr. 52/2012, must be respected.

Places surveilled through video devices:

- areas of access for the public,
- areas with restricted access;
- areas inside the headquarters of Global Relocation Services

## **Tranparency**

Global Relocation Service provides information for the individuals who enter the surveilled area by means of Regulation nr. 679/2016 and art.11 from Decision nr.52/2012.

In this way, information from the Regulation is being brought to the knowledge of data subjects clearly and permanently, through a poster “ Informational note” which is posted on a reasonable distance near surveillance areas, so it may be seen by every person.

## **Protection of private life and security of information**

For the protection of the security of the video system and to extend the protection of private life, the following technical and organizational measures have been added:

- limitation for the retention period of filmed material, in compliance with security measures;
- the saved filmed material is being kept in a secured space;
- all users with access rights have signed that they will keep confidentiality in their job description files;
- access right will be given only for resources that are strictly necessary for execution of working tasks;
- the person who has the right to give, modify or cancel the access right of users, due to procedural access to data base, is the system administrator, named by the controller;
- the person who is responsible for the physical security keeps a permanent list with all individuals that have access to the surveillance system, with specifying what kind of access each have;
- the data protection officer will be consulted before the installation of any new surveillance system.

Access to the video images is limited to a small amount of people who can be clearly identified and it is determined through remits in the job description. (with what purpose and what kind of access)

Global Relocation Service imposes limits to individuals who have rights to copy, download, delete or modify any filmed material.

All employees with right to access to filmed material have been initially instructed in personal data privacy. This kind of instruction is offered to any new employee, followed by the fact that periodic trainings will be made on data privacy at least once every two years.

Any kind of security breach of the surveillance system will be noted in the Investigations Registry, and the DPO will be informed, without delay, in maximum 12 hours.

The surveillance system is not used for verifying work attendance or evaluation of performance at the office. Exceptionally, access may be given to the Disciplinary Committee in case of a disciplinary investigation, with requirement that those informations help investigating a crime or a disciplinary irregularity.

Information from the surveillance systems may be put at the disposal of public institutions, at their request.

Any transfer or disclosure of personal data to third parties will be documented and put under evaluation for the necessity of communication and compatibility between the scope for communication and the scope for the data initially processed. In these cases, the DPO will be consulted. Any disclosure will be written in a Registry.

### **Data retention period**

The retention period of data obtained through surveillance systems is proportional with the scope for which the data is being processed, so the images are kept for no longer than 30 days, with the exception of legal situations or justified situations.

After 30 days, the images are deleted automatically in the order that they have been recorded.

In case of security breach, and also on justified situations, the retention period of filmed material may outdo normal limits depending on the time required to finish investigations on data breach.

The data storage is documented rigorously, and the necessity of the storage is being revised periodically. (once every two months).

In case the data storage durations is more than 30 days, this will be stated in the Registry.

### **Rights of data subjects**

Global Relocation Service guarantees that the rights of data subjects are fully respected in compliance with Regulation nr.679/2016.

All individuals who are implicated in the activity of surveillance cameras and those responsible with the administration of filmed material will respect the access to data procedure.

The DPO will assure updates in compliance with recent legislation.

Due to Regulation 679/2016, data subjects have the following rights:

- right to access
- right to rectification
- right to erasure
- right to restriction of processing
- right to data portability
- right to object
- right not to be past of a decision based on automatic processing, along profiling.

For the exercise of the rights mentioned above, the data subject must send a request, dated and signed, to :

GLOBAL RELOCATION SERVICE S.R.L

headquarters at nr. 20, Parangului street, Sector 1, București/ nr. 138, Atomistilor street ,  
Magurele, Ilfov County

e-mail: [office@globalrelo.ro](mailto:office@globalrelo.ro) / [gdpr@globalrelo.ro](mailto:gdpr@globalrelo.ro)

For more informations, you may contact our DPO at: [gdpr@globalrelo.ro](mailto:gdpr@globalrelo.ro)

We mention the fact that the exercise of your rights is free for one request per year.

The data subject also has the right to send complaints to National Authority for Protection of Personal Data, at Blvd G-ral Gheorghe nr. 28-30, sector 1, București, postal code 0103336, e-mail: [anspdcp@dataprotection.ro](mailto:anspdcp@dataprotection.ro) .

#### Appendix 1

Global Relocation Service processes your personal data in order to : prevent crimes, to monitor individuals who access the premises, to assure security of the premises and assets and also to the security of the persons inside the premises of Global Relocation Service. Data retention period is 30 days, only employees from Management, IT and Security have access to this data. After this retention period this kind of data will be deleted permanently and automatically. This data may be transmitted to authorities for legal matters.

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