

**REGISTER NUMBER: 302**

**NOTIFICATION FOR PRIOR CHECKING**

Date of submission: 07/12/2007

Case number: 2007-634

Institution: OLAF

Legal basis: article 27-5 of the regulation CE 45/2001<sup>(1)</sup>

*(1) OJ L 8, 12.01.2001*

**INFORMATION TO BE GIVEN<sup>(2)</sup>**

*(2) Please attach all necessary backup documents*

1/ Name and adress of the controller

2) Name and First Name of the Controller: SONNBERGER Harald

3) Title: Head of Unit

4) Directorate, Unit or Service to which the Controller is attached: D.08

5) Directorate General to which the Controller is attached: OLAF

2/ Organisational parts of the institution or body entrusted with the processing of personal data

26) External Company or Directorate General to which the Processor is attached:

25) External Company or Directorate, Unit or Service to which the Processor is attached:

3/ Name of the processing

OLAF CCTV Security System

4/ Purpose or purposes of the processing

The system has two specific functions: to record the images and store them in a system in order to facilitate an investigation in case of a security incident; and to permit security guards to monitor in real time people entering or exiting OLAF zones.

<p>5/ Description of the category or categories of data subjects</p> <p>14) Data Subject(s) concerned:</p> <p>Anybody entering or leaving OLAF premises and special protected areas.</p> <p>16) Category(ies) of Data Subjects:</p> <p>See question 14</p>
<p>6/ Description of the data or categories of data (including, if applicable, special categories of data (article 10) and/or origin of data)(<i>including, if applicable, special categories of data (article 10) and/or origin of data</i>)</p> <p>17) Data field(s) of Data Subjects:</p> <p>Attention: Please indicate and describe in the answer to this question also data fields which fall under article 10</p> <p>Video of any movement detected by the camera, time and date, location</p> <p>18) Category(ies) of data fields of Data Subjects:</p> <p>Attention: Please indicate and describe in the answer to this question also categories of data fields which fall under article 10</p> <p>Video Metadata (time and location)</p>
<p>7/ Information to be given to data subjects</p> <p>15a) Which kind of communication(s) have you foreseen to inform the Data Subjects as described in articles 11 - 12 under 'Information to be given to the Data Subject'</p> <p>Pictograms indicating video surveillance will be put on entry doors to OLAF premises. A privacy statement will be available at the guard upon request.</p>
<p>8/ Procedures to grant rights of data subjects (rights of access, to rectify, to block, to erase, to object)(<i>rights of access, to rectify, to block, to erase, to object</i>)</p> <p>15b) Which procedure(s) did you put in place to enable Data Subjects to exert their rights: access, verify, correct, etc., their Personal Data as described in articles 13 - 19 under 'Rights of the Data Subject' :</p> <p>See attached privacy statement.</p>
<p>9/ Automated / Manual processing operation</p>

7) Description of Processing:

Attention: Please describe in the answer to this question if you process personal data falling under article 27 "Prior-Checking (by the EDPS - European Data Protection Supervisor)"

The video security system monitors and records all entrances to and exits from the OLAF premises, as well as entrances to and exits from the physical security perimeter and physically protected areas (such as the OLAF Document Management Centre, where case related documents are handled, stored, and archived, and IT technical rooms) within the building.

The video system consists of a number of digital cameras and one central database for storage. The images recorded by these cameras are automatically stored in a database on the video storage server. The cameras use a separate network infrastructure to communicate with the central storage server. The Security Officers have access to that server via dedicated workstations.

The live images from the cameras are automatically displayed on the security guards' monitors. Security guards monitor selected cameras in real time.

None of the cameras are recording movements outside OLAFs premises.

8) Automated Processing operation(s):

The monitoring and recording of entrances and exits by the system; storage of images in database on video storage server; display of live images on security guard monitors.

9) Manual Processing operation(s):

Manual processing will only happen in case of a security incident. In such a case, the security officer will logon to the recording device and be able to view recordings from the time of the incident.

10/ Storage media of data

Database on Hard-disk and backup media.

11/ Legal basis and lawfulness of the processing operation

11) Legal basis of Processing:

Article 297 of the EC Treaty; Article 17 of the Staff Regulations;  
Regulation 1073/99 - Recitals 4, 17, 18; Articles 8, 11(1), 12(3);  
Commission Decision 1999/352: Recitals 4, 5; Article 3;  
Commission Decision 2001/844/EC, ECSC, Euratom (security provisions)  
Commission Decision 2006/3602/EC concerning security of information systems;  
Commission's IT security policy (PolSec);  
OLAF Information Security Policy (Section 4.5 of the OLAF Manual).

12) Lawfulness of Processing:

Answering this question please also verify and indicate if your processing has to comply with articles 20 "Exemptions and restrictions" and 27 "Prior checking (by the EDPS)"

The CCTV system is part of the security infrastructure that protects OLAF premises and IT systems which in turn support OLAF investigations and all other activities to protect the financial interests of the European Union. Thus, the processing is lawful because it is necessary for the performance of a task carried out in the public interest on the basis of the Treaties or other legal instruments, in accordance with Article 5(a).

The exemptions and restrictions of Article 20 do not apply.

This processing is subject to prior checking under Article 27.

12/ The recipients or categories of recipient to whom the data might be disclosed

20) Recipient(s) of the Processing:

Security guards have access to the live video.

The security officers of OLAF have access to the recorded data.

21) Category(ies) of recipients:

See reply to Question 20.

13/ retention policy of (categories of) personal data

Recorded data will be kept for no longer than 1 year.

13 a/ time limits for blocking and erasure of the different categories of data (on justified legitimate request from the data subject) (Please, specify the time limits for every category, if applicable)

(on justified legitimate request from the data subject)

(Please, specify the time limits for every category, if applicable)

22 b) Time limit to block/erase data on justified legitimate request from the data subjects

1 Month

14/ Historical, statistical or scientific purposes

*If you store data for longer periods than mentioned above, please specify, if applicable, why the data must be kept under a form which permits identification,*

22 c) Historical, statistical or scientific purposes - If you store data for longer periods than mentioned above, please specify, if applicable, why the data must be kept under a form which permits identification

15/ Proposed transfers of data to third countries or international organisations

27) Legal foundation of transfer:

Only transfers to third party countries not subject to Directive 95/46/EC (Article 9) should be considered for this question. Please treat transfers to other community institutions and bodies and to member states under question 20.

Not applicable.

28) Category(ies) of Personal Data or Personal Data to be transferred:

Not applicable.

16/ The processing operation presents specific risk which justifies prior checking (please describe): *(please describe)*:

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This processing is subject to prior checking under Article 27.

Article 27.2.(a) Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures,

Yes.

Article 27.2.(b) Processing operations intended to evaluate personal aspects relating to the data subject,

No.

Article 27.2.(c) Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,

No.

Article 27.2.(d) Processing operations for the purpose of excluding individuals from a right, benefit or contract,

No.

Other (general concept in Article 27.1)

No.

17/ Comments

1) Date of submission:

10) Comments if applicable:

36) Do you publish / distribute / give access to one or more printed and/or electronic directories?

Personal Data contained in printed and/or electronic directories of users and access to such directories shall be limited to what is strictly necessary for the specific purposes of the directory.

If Yes, please explain what is applicable.

no

37) Complementary information to the different questions if applicable, including attachments to this notification which should not be public :

PLACE AND DATE:07/12/2007

DATA PROTECTION OFFICER: LAUDATI Laraine

INSTITUTION OR BODY:OLAF