

EEB2
CONTROLLER'S RECORD OF PERSONAL DATA
PROCESSING ACTIVITY



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| Item No. | 31 | |
| 1. | Name, department and e-mail address of Delegated Controller (author) | Charlier Frank (IT-Department) frank.charlier@eursc.eu |
| 2. | Name, department and e-mail address of Joint Controller (if any) - attach arrangement between Joint Controllers | |
| I. Processing Activity | | |
| 3. | Name of processing | Video surveillance of school premises and investigation of security incidents |
| 4. | Description and purpose of processing | <p><u>Video Surveillance</u> In accordance with Belgian law on video surveillance (https://www.belgium.be/fr/justice/respect_de_la_vie_privree/surveillance_camera), EEB2 has installed surveillance cameras on the periphery of the EEB2 premises (rented from Securitas) and on several strategically chosen points within the EEB2 premises (owned by EEB2). The cameras record images constantly.</p> <ul style="list-style-type: none"> • The images from the cameras owned by EEB2 are stored on its servers. The IT Department has access to both live and stored images; Fact-group (the security company) monitors live images. • The images from the cameras rented from Securitas are stored on the Securitas server (on EEB2 premises) and both live and stored images are accessible by the IT Department and remotely accessible by Securitas. Fact-group (the security company) monitors live images. <p><u>Security incidents</u> When a security incident occurs, it is reported to the Safety and Security Officer, who opens an investigation of the incident. With the assistance of the IT Department, the Safety and Security Officer may review historical images which may be relevant to the incident. When the recorded image shows that a pupil is involved in the incident, the EEB2 Learning Advisor(s) will be asked to help identify the pupil and the</p> |

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| | | images may be provided to the management. The images may be provided to the pupil's parent/legal guardian or to the police. The rules adopted by EEB2 for investigation of security incidents are attached. |
| 5. | Name and e-mail address of processor (sub-contractor) | Fact-group (Security company) – surveillance of images on all cameras Securitas (david.hoeven@securitas.be) – has installed poles with cameras rented by EEB2 Contracts with EEB2 are attached |
| 6.) | Does the processing operation involve any automated decision-making/profiling? | <input checked="" type="checkbox"/> Automated <input checked="" type="checkbox"/> Manual |
| 7. | Storage media | <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Electronic |
| 8. | Retention period | <i>Please suggest what you believe would be a reasonable retention period based on need and any applicable EU or Belgian legal obligations of which you are aware:</i> <input type="checkbox"/> ___ days <input checked="" type="checkbox"/> 3 weeks <input type="checkbox"/> ___ months <input type="checkbox"/> ___ years <input checked="" type="checkbox"/> other (when there is a security incident the image will be kept until the investigation is completed) |
| II. Legal basis | | |
| 9. | Legal basis of processing | <input type="checkbox"/> Data subject's consent (attach blank consent form) <input type="checkbox"/> Necessary for compliance with legal obligation <input checked="" type="checkbox"/> Necessary to protect data subject's vital interests <input checked="" type="checkbox"/> Necessary for performance of task carried out in the public interest or in controller's official authority <input type="checkbox"/> Necessary for legitimate interests of controller or 3 rd party <input type="checkbox"/> Necessary for performance of contract |
| III. Data | | |
| 10. | Categories of data subjects | <input checked="" type="checkbox"/> Pupils <= 16 yrs old <input checked="" type="checkbox"/> Pupils > 16 yrs old <input checked="" type="checkbox"/> Parents <input checked="" type="checkbox"/> PAS <input checked="" type="checkbox"/> Seconded staff (excluding teachers) <input checked="" type="checkbox"/> Seconded staff (teachers) <input checked="" type="checkbox"/> Locally recruited staff <input checked="" type="checkbox"/> Interim staff <input checked="" type="checkbox"/> (Successful) candidates (to a vacancy) <input checked="" type="checkbox"/> Unsuccessful candidates (to a vacancy) <input checked="" type="checkbox"/> Trainees <input checked="" type="checkbox"/> Vendors <input checked="" type="checkbox"/> Other (any person that entrance the EEB2 premises) |
| 11. | Categories of personal data collected | <input type="checkbox"/> Name <input type="checkbox"/> Surname <input type="checkbox"/> Date of birth <input type="checkbox"/> City of birth <input type="checkbox"/> Country of birth <input type="checkbox"/> Nationality <input type="checkbox"/> Gender <input type="checkbox"/> Data concerning siblings <input type="checkbox"/> School email address <input type="checkbox"/> Personal email address <input type="checkbox"/> Professional email address |

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| | | <input type="checkbox"/> Professional phone number <input type="checkbox"/> Personal phone number <input type="checkbox"/> Home address <input type="checkbox"/> Picture <input type="checkbox"/> Student ID number <input type="checkbox"/> Parental marital status <input type="checkbox"/> Name of legal guardian (main custody of the child) <input type="checkbox"/> Salary or economic information <input checked="" type="checkbox"/> Other (video images with date and time) |
| 12. | Documents collected containing personal data | <input type="checkbox"/> Copy of passport <input type="checkbox"/> Copy of ID <input type="checkbox"/> Copy of transport document <input type="checkbox"/> Birth certificate <input type="checkbox"/> Marriage certificate <input type="checkbox"/> Document proving the exercise of parental authority <input type="checkbox"/> CV <input type="checkbox"/> Motivation letter <input type="checkbox"/> Application email of the candidate <input type="checkbox"/> Correspondence with the candidate <input type="checkbox"/> Declaration concerning the relevant professional experience <input type="checkbox"/> Declaration concerning allowances <input type="checkbox"/> Copy of relevant diploma <input type="checkbox"/> Reference letter <input type="checkbox"/> Work contract <input type="checkbox"/> Evaluation sheets |
| 13. | Special categories of data | <p><i>Please specify type and justification for processing:</i></p> <p>1. Type:</p> <input type="checkbox"/> health data <input type="checkbox"/> data revealing religious/philosophical beliefs <input type="checkbox"/> data revealing trade union membership <input checked="" type="checkbox"/> data revealing racial or ethnic origin <input type="checkbox"/> data concerning a natural person's sex life or sexual orientation <input type="checkbox"/> data revealing political opinions <input type="checkbox"/> genetic data <input type="checkbox"/> biometric data for the purpose of uniquely identifying a natural person <input checked="" type="checkbox"/> data concerning criminal convictions and offences |
| <p>2. Justification for processing:</p> <input type="checkbox"/> data subject's explicit consent <input type="checkbox"/> relates to personal data made public by the data subject <input type="checkbox"/> Processing necessary to meet obligations in field of employment, social security and social protection law <input checked="" type="checkbox"/> Processing necessary to protect data subject's or other natural person's vital interests where data subject incapable of giving consent <input checked="" type="checkbox"/> Processing necessary for establishment, exercise or defence of legal claims <input checked="" type="checkbox"/> Processing necessary for reasons of substantial public interest <input type="checkbox"/> Processing necessary for medical/health care <input type="checkbox"/> Processing necessary for public health <input type="checkbox"/> Processing necessary for archiving, research or statistics | | |
| <p>IV. Rights of Data Subjects</p> | | |
| 14 | Privacy statement (Information provided to the data subject) | <input type="checkbox"/> Data collected from data subject <input checked="" type="checkbox"/> Data not obtained from data subject |
| 15 | Manner of providing the privacy statement to the data subjects | <p><i>Please suggest what you believe would be a reasonable way to provide the privacy statement, such as a reference in the first correspondence with the data subject to a link to the EEB2 website where the statement can be viewed.</i></p> <input checked="" type="checkbox"/> online <input type="checkbox"/> email <input type="checkbox"/> text |

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| | (procedure to grant rights) | <input checked="" type="checkbox"/> other (Sign camera protection outside the school) |
| V. Access and disclosure | | |
| 16 | Recipients of the data | <i>May be parents/legal guardians and police</i> |
| 17 | Transfers to non-EU countries or international organisations | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If transfers are made, specify: Non-EU country to which transfers made _____ Basis of transfer: <input type="checkbox"/> Adequacy decision relating to recipient country (Andorra, Argentina, Canada (commercial organisations), Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Switzerland, Uruguay and the US (limited to the Privacy Shield framework) <input type="checkbox"/> Appropriate safeguards established <input type="checkbox"/> Derogation: <input type="checkbox"/> Data subject's explicit consent <input type="checkbox"/> Transfer necessary for performance of contract with data subject <input type="checkbox"/> Transfer necessary for performance of contract with other on data subject's behalf <input type="checkbox"/> Transfer necessary for important reasons of public interest <input type="checkbox"/> Transfer necessary for establishment, exercise or defence of legal claims <input type="checkbox"/> Transfer necessary to protect vital interests of data subject or others where data subject incapable of giving consent <input type="checkbox"/> Transfer of data from a public register |
| 18 | Is a Data Protection Impact Assessment required? | <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes, because the processing involves high risk of the following type: <input type="checkbox"/> Sensitive data or data of a highly personal nature <input checked="" type="checkbox"/> Data concerning vulnerable data subjects <input checked="" type="checkbox"/> Data processed on a large scale <input checked="" type="checkbox"/> Systematic monitoring <input type="checkbox"/> Evaluation or scoring <input type="checkbox"/> Innovative use or applying technological or organisational solutions <input type="checkbox"/> Automated decision making with legal or similar significant effects <input type="checkbox"/> Prevents data subject from exercising a right or using a service or a contract |