



European School Bergen

2023.12.01



Privacy Statement – Video Surveillance

Contents

Privacy Statement – Video Surveillance	Error! Bookmark not defined.
1. What are the categories of personal data collected by the School?	2
2. What are the purposes for which personal data are collected?	2
3. What is the legal basis for the processing of personal data?	3
4. Who has access to the personal data and whom do we share them with?	3
5. How long do we keep your personal data?	4
6. Where are the cameras installed?	4
7. What steps are taken to safeguard your personal data?	4
8. What are your rights?	5
9. Whom to contact	5
10. Changes to this Privacy Statement	5
11. Contact details	5

The European School of Bergen (hereinafter, the “School”) is committed to respecting your privacy and to complying with the requirements of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regards to the processing of personal data on the free movement of such data (hereinafter, “the GDPR”) and the Dutch policy rules regarding video surveillance (Beleidsregels cameratoezicht).

‘Personal data’ means any information related to an identified or identifiable natural person. The ‘data subjects’ are any persons accessing the School grounds (i.e. visitors, pupils, parents, School’s staff members, external service providers contracted by the School).

As defined by Article 4 (7) of the GDPR, the ‘controller’ is the natural or legal person, public authority, agency or other body which alone or jointly with others, determines the purposes and means of the processing of personal data. The director of the School¹ is considered to be the ‘controller’ and camera surveillance is the exclusive responsibility of the controller.

This Privacy Statement informs you about why and how the School processes information it collects about you with video surveillance. It sets out what kind of personal data it may collect about you, how it processes them, and your rights in relation to such collection.

1. What are the categories of personal data collected by the School?

The categories of data that are collected and processed are the following:

- The images captured by the cameras (no sound is recorded).

2. What are the purposes for which personal data are collected?

The School collects, uses, stores and processes your personal data:

- To enhance the safety and security of pupils and staff;
- To protect School property against vandalism and damage; and,
- To contribute to the identification of offenders and pupils who are in violation of the School rules
- To monitor and ensure Safety and Security on its premises;
- To promote a safe School community;

¹ Contact details: ber-director@eursc.eu

- To assist in the prevention, reduction, detection and investigation of crime, vandalism or other incidents directed against property and infrastructure of the School;
- To assist in the apprehension and prosecution of offenders, including use of images as evidence in criminal proceedings;
- To assist in the investigation of suspected breaches of School regulations by staff, pupils, third parties or visitors on the School premises;
- To assist in the investigation of breaches of the School's code of conduct and policies by staff, pupils, third parties, etc.;
- To investigate complaints where relevant and appropriate; and,
- To monitor access to the School.

Video surveillance is not used for any other purposes, such as to monitor the work of employees and their attendance, nor is it used in combination with automatic identification features (i.e. facial recognition or automatic tracking technologies).

3. What is the legal basis for the processing of personal data?

The School uses the video surveillance in its legitimate interest of ensuring the security, safety and protection of individuals and property on the School grounds. Thus, the legal basis for the processing of your personal data relies on article 6, paragraph 1, numeral (f) of the GDPR: "Necessary for legitimate interests of controller or 3rd party".

The use of the video surveillance is also subject to the requirements of the Dutch policy rules regarding video surveillance (Beleidsregels cameratoezicht).

4. Who has access to the personal data and whom do we share them with?

Personal data collected by the School will be processed within the School and will not be disclosed outside of the Netherlands.

Only staff members with a legitimate interest in accessing the surveillance cameras and images will process your data. These persons are bound by an internal procedure² for accessing and viewing recorded surveillance camera images and are committed to protecting the confidentiality of your personal data. They also receive data protection training in order to act in accordance with the GDPR's provisions.

² Internal guideline for CCTV images access regime.

The School's security guards are able to view the real-time video images. However, they will not have access to the stored images or real-time viewing of images.

The video recordings may be shared with judicial or law enforcement authorities in the exercise of their duties governed by public law, when required by law for the purpose of ongoing inquiries or to investigate or prosecute criminal offences.

5. How long do we keep your personal data?

The images are kept for a maximum of 28 days³. Older images will be automatically overwritten by new images.

If the images can serve as evidence in case of an offence, crime, damage, or a security incident, they may be retained for the duration of the investigation thereof.

6. Where are the cameras installed?

The camera locations and viewing angles are based on a methodical risk analysis, which ensures that cameras are only directed at the most relevant locations inside and outside the buildings.

Cameras are installed inside the School's perimeter as well as in the School's buildings. The cameras are mainly installed at the School's entrances, perpendicular to the building's entrances/exits, in the corridors and halls and in alignment with pupil's storage lockers to prevent any damage or any theft.

The cameras are not installed in private areas (i.e. restrooms, changing rooms, classrooms, offices, swimming pool or other areas in which there is a reasonable expectation of privacy).

7. What steps are taken to safeguard your personal data?

In order to protect data subjects' personal data, a number of technical and organisational measures have been put in place. These include appropriate measures to address online security, physical security, risk of data loss, modification or unauthorised access, taking into consideration the possible risks associated with processing the data and the nature of the data being protected. Such measures relate to the camera system, the server room and the Security Control Room.

³ The cameras are functioning 24/7, however images will only be recorded when motion is detected in the monitored areas.

8. What are your rights?

With respect to the processing of your personal data, you have the right to be informed and to access your personal data. You also have the right to erasure, restriction of processing and to object to the processing of your data. When exercising your rights, you will have to be sufficiently specific. Misuse of rights is not allowed.

9. Whom to contact

To facilitate the exercise of your rights, you can contact our Data Protection Officer BER-DPO-CORRESPONDENT@eursc.eu

The School will respond to these requests without undue delay and within one month at the latest. This period can be extended by two further months if necessary due to the complexity and the number of requests.⁴ Should the School decline to comply with a request, you will be informed of the reasons for such a decision.

If you consider that the School has not complied with the data protection laws applicable (including the GDPR) or that your rights have been infringed upon as the result of the processing of your personal data, you have the right to recourse and can contact the [National Supervisory Data Protection Authority](#).

10. Changes to this Privacy Statement

We reserve the right to update this Privacy Statement at any time, and we will provide you with a new Privacy Statement if and when we make substantial changes.

11. Contact details

Molenweidtje 5
1862 BC Bergen NH (The Netherlands)
Email : BER-info@eursc.eu
Phone number : +31 (0)72-5890109

Last update: November 2023.

⁴ Article 12(3) GDPR.