

## Video Surveillance Policy

Data protection is very important to us. We value your privacy and private life. Bucharest International School of Management (BISM), we are an integral part of the BISM Group, with entities such as BISM INTERNATIONAL Association, BISM EDUCATION SRL and BISM EXECUTIVE SRL.

As operator, Bucharest International School of Management (BISM), hereinafter referred to as BISM or the Organization, is a Romanian legal entity, with registered office in Bucharest, sector 3, Puțul lui Zamfir Street, no. 36, 3rd floor, office 3, registered in the Special Register of Associations and Foundations, under no. 41/23.07.2010, Fiscal Code 27239140.

Our organization, as well as the rest of the legal entities in the BISM group, are responsible for compliance with the provisions of the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC, abbreviated to GDPR).

This Video Surveillance Policy specifically describes how BISM process your personal data when you visit one of BISM locations.

### HOW YOUR IMAGE IS PROCESSED?

BISM processes personal data, i.e. images, by means of the video surveillance system installed outside/inside the BISM premises. The video surveillance subsystem complements the burglary detection and alarm, access control, fire detection, signaling and alarm subsystems, thus forming an integrated physical security system. Thus, the CCTV subsystems work in a collaborative relationship with the other subsystems listed above, providing the real-time monitoring element and the possibility of post-event viewing as well as video recording, display and transmission to persons (employees of BISM) designated as users of the surveillance subsystem.

BISM, through video surveillance systems, collects and processes video recordings for the purpose of monitoring the access of persons to BISM, ensuring the security of BISM premises and assets and the safety of persons on BISM premises, ensuring the security of persons and property, guarding and protecting property, buildings, valuables and materials used to prevent and combat crime. Video surveillance is used only in situations where conventional means applied are considerably less effective in achieving the above objectives, according to the risk analysis carried out at BISM level.

BISM does not process personal data resulting from video monitoring for private purposes and the surveillance system is not used for monitoring the activity of employees or collaborators or for employee clocking-in, and the data collected shall not be passed on to third parties unless required by law.

The existing video system has been installed following risk analyses attached to the protection and security plans.

The areas under video surveillance include:

- ✓ access areas and places and spaces open or intended for the public (reception, waiting area, offices)
- ✓ restricted access areas (e.g. server room or document storage room - archives).

The video surveillance cameras shall be mounted in visible places and shall be indicated by the posting of a poster containing the relevant pictogram and the message VIDEO SURVEILLANCE AREA, positioned at a reasonable distance from the place where the video cameras are located, so that it can be seen by any person entering the premises of BISM.

Areas where there is a high level of expectation of privacy, such as toilets, cloakrooms or similar locations, are not monitored.

## **THE LEGAL BASIS FOR THE PROCESSING OF YOUR IMAGE**

- ✓ Law No 333/2003 on the security of objectives, property, valuables and protection of persons and its implementing rules;
- ✓ Decision No 301 of 11 April 2012 approving the Methodological Rules of Law No 333/2003 on the security of objectives, goods, values and protection of persons;
- ✓ General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC, abbreviated to GDPR );
- ✓ Law No 190/2018 on measures implementing Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data;
- ✓ Decision No 174/2018 of the National Authority for Personal Data Processing Supervision - ANSPDCP on the list of operations for which it is mandatory to carry out the personal data protection impact assessment.
- ✓ Guideline 3/2019 issued by the European Data Protection Board (EDPB) containing updated data protection guidelines for video surveillance.

## **HOW YOUR COLLECTED IMAGES ARE PROTECTED?**

The information collected is kept in electronic form and the following technical and organizational measures are implemented to protect it:

- ✓ limitation of the storage time of images according to legal requirements (30 days);
- ✓ restricted physical access to the premises where the storage media (DVRs or NVRs) on which the recorded images are stored;
- ✓ limitation of access to images running in real time to employees/agents designated to carry out specialized security work;
- ✓ Logical access control to recordings. Only the system administrator (appointed by the organization), has the right to grant, modify or cancel user access rights;
- ✓ Ensuring appropriate training on data privacy requirements and confidentiality agreements for persons viewing live images or having access to recorded images;
- ✓ Ensuring contractually or through agreements that authorized persons implement technical and organizational data protection measures.

Your collected images are stored on premises and equipment located within BISM. The duration of storage is in accordance with legal requirements (30 days), after which the images are automatically deleted in the order in which they were recorded.

## HOW YOUR COLLECTED IMAGES ARE DISCLOSED?

To the extent permitted by data protection law, in order to fulfill our contractual and legal obligations we may transmit or allow access to recorded images to national authorities or service providers.

The images recorded by video surveillance cameras may be made available to judicial bodies, institutions/authorities provided for by law, for the fulfillment of a legal obligation and/or the exercise of their official function, upon their express, written and reasoned request.

Any transfer and disclosure of personal data to third parties will be documented and subject to a rigorous assessment of the necessity of the disclosure and the compatibility between the purpose for which the disclosure is made and the purpose for which such data was originally collected for processing (security and access control).

Any disclosure situation will be recorded in the **Disclosure Case Log**.

Personal data processed through the use of video surveillance means are NOT transferred abroad.

## WHAT ARE YOUR RIGHTS WITH REGARD TO YOUR COLLECTED IMAGES?

Under GDPR regulations, you have the following rights:

- ✓ *the right to information*. You have the right to receive information about how and why we process your personal data;
- ✓ *the right to obtain confirmation* from the company whether or not personal data concerning you are being processed and, if so, access to that data;
- ✓ *the right to rectify* personal data concerning you;
- ✓ *the right to erasure ("right to be forgotten")* of personal data concerning you or to restrict processing, subject to certain exceptions;
- ✓ *the right to object to processing*, subject to certain exceptions.
- ✓ *the right to data portability*,
- ✓ *the right to object*,
- ✓ *the right not to be subject to a decision based solely on automated processing, including profiling*.

If you wish to make a request under GDPR, in order to be able to respond to you in an effective manner you will need to provide us with your identity (full name, identification details) and indications of the information you are requesting by sending an email to the following email address: [info@bism.ro](mailto:info@bism.ro).

In the case of a request for access to recorded images relating to you, the request may be dealt with by granting access to the requested recording or by providing a copy of the recording. The request for access must state the date, time and location for which access to the surveillance camera footage is sought.

The recording provided in the case of an access request depends on the technical conditions of the recording, the conditions under which the images were taken and the rights of other persons who may appear in the recording (images in which other persons appear will be edited so that it is not possible to recognize/identify them). Access may be restricted to protect the rights and

freedoms of other persons (e.g. if other persons appear in the images and it is not possible to obtain their consent or their images cannot be edited).

If you have any complaints about the way we process your personal data, you have the right to lodge a complaint with the National Supervisory Authority for Personal Data Processing ([www.dataprotection.ro](http://www.dataprotection.ro)) at the following contact details:

Address: B-dul G-ral. Gheorghe Magheru 28-30 Sector 1, postal code 010336, Bucharest, Romania;

E-mail: [anspdcg@dataprotection.ro](mailto:anspdcg@dataprotection.ro),

Telephone: 0318059211.

Given the possibility of identifying new processing of personal data, the fact that personal data protection laws and supervisory authority guidance change and improve over time, this Video Surveillance Video may also change. BISM reserves the right to change this notice at any time, for any reason and without notice. Any changes to the privacy notice will be available for reading at BISM's registered office and at [\(link\)](#).

If you want to make use of this right or if you have any questions regarding your personal data, please contact BISM by sending an email to the following email address: [info@bism.ro](mailto:info@bism.ro). We will make sure your email is received by the department who manages your personal data.