



Specific Privacy Statement related to video surveillance

European School Brussels III

Preamble

The School seeks to promote and foster school safety and a safe educational and work environment.

After having carefully considered and balanced the individual's right to privacy with the School's duty to promote the health, welfare and safety of pupils and staff, the School has decided to implement and use surveillance cameras, when necessary and appropriate, in its facilities and premises.

Scope

This statement sets out the conditions under which the School uses its video-surveillance systems in the light of the security and legal requirements it is subject to, in accordance with the relevant regulations.

This statement does not apply to legitimate academic use of video cameras for educational purposes that have been approved by the School and for which parents have provided their consent through the SMS consent form.

What are the categories of personal data collected by the video surveillance system?

The School surveillance cameras solely record digital images with time, date and location. They do not monitor or record sound nor are they used in combination with automatic identification features, such as facial recognition, or automatic tracking technologies.

What are the purposes for which personal data are collected?

The purposes of video surveillance on School premises are as follows:

- to promote a safe environment by deterring conduct that violates the law and/or School policies.
- to record images for future identification of individuals in the event of vandalism or offences.
- to aid in search of lost or missing children, and
- to assist emergency services personnel.

What is the legal basis for processing through video surveillance?

The use of the video surveillance is based on the School's "legitimate interests" of ensuring the safety and protection of individuals and property, pursuant to article 6.1 (f) GDPR.

The use of the video surveillance is also subject to the requirements of the Law of 21st March 2007 regulating the installation and use of surveillance cameras.



Which areas are under surveillance?

Camera locations and viewing angles are based on a methodological risk analysis, ensuring that cameras point only at the most relevant locations inside and outside the buildings.

Cameras are thus installed mainly at main entrances, emergency and fire exits, the entrance to the parking garage, as well as near several important stairways, connection points, restricted areas that require additional security and in areas deemed to be at risk for vandalism, such as lockers.

Surveillance cameras will not be used in the private areas of restrooms, showers, locker rooms and any other area in which there is a reasonable expectation of privacy. Surveillance cameras will also not be used in offices and classrooms.

Who has access to the images and whom do we share them with?

Only the authorized personnel are involved with and/or have access to surveillance cameras and any resultant recordings:

- Live video images are accessible to security guards on duty who work for an external security company and with whom the School has entered the relevant contractual agreements to ensure that this provider is fully compliant with the GDPR's provisions and acts only in accordance with the School's specific directions.
- Access to recorded images may be accessible, with the School Director's approval and following the consultation of the School DPO, to the Deputy Directors, the School Safety and Security Officer and/or the advisor.

Personnel with access rights have entered confidentiality undertakings that they will not transfer, show, or otherwise disclose the content of any video surveillance footage to anyone except authorised recipients.

Information gathered within the framework of the video-surveillance system may be disclosed to the judicial or law enforcement authorities for the purpose of ongoing inquiries or to investigate or prosecute criminal offences.

How do we protect and safeguard your information?

Technical and physical measures are constantly taken to ensure the security of the system and the safeguarding of data. Access to the video surveillance footage and/or the technical architecture of the video surveillance system is restricted to authorised personnel and individual access profiles determine which operations are allowed.

How long are the images kept?

Recorded footage is retained for a maximum of 30 days and deleted automatically thereafter.



If any image needs to be stored to further investigate or evidence a security incident, it may be retained for the duration of the investigation, in accordance with article 6, §3, of the Law of 21st March 2007 regulating the installation and use of surveillance cameras.

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 rectification, erasure and to object to the processing.

To facilitate the exercise of your rights, you may submit your request to our School's Data Protection Officer: IXL-DPO-CORRESPONDENT@eursc.eu

The School will respond to these requests without undue delay and within one month at the latest. Should the School decline to comply with a request, you will be informed of the reasons for such a decision.

Who should you contact in case of a complaint?

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 as the result of the processing of your personal data, you have the right of recourse and can contact the [Belgian Supervisory Authority](#).

Changes to this Specific Privacy Statement

The School reserves the right to update this Specific Privacy Statement at any time, and provide you with a new version whenever the amendments are substantial.