

Privacy Notice

on data processing in the implementation of a camera surveillance system operated by the Institute for Foreign Affairs and Trade

1. The purpose of this Notice

Pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as: “GDPR”) and to Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter referred to as: “Information Act”), the **Institute for Foreign Affairs and Trade** (seat: Hungary, 1016 Budapest, Bérc utca 13-15; represented by Márton Ugródsy, director; hereinafter referred to as: “**the Institute**”) has set out the following Policy to protect the personal data it processes.

2. Scope of this Notice

The scope of this Notice shall be applicable to the departments and their personnel involved in the operation and maintenance of the CCTV systems operated by the Institute, as well as the departments and employees specified in this Notice.

Matters not covered in this Notice shall be governed by the Institute's general rules on privacy, the privacy policy on cameras operated by the Institute, and applicable legislation on data protection. The provisions of this Notice are not contradictory to any applicable data protection laws or the Institute's general data protection rules.

3. Identity of the data controller and the place of processing

The identity of the data controller and the place of processing: The Institute and its competent data processors, employees; the place of data processing is the workplace of these employees and data processors.

The image recording and capturing equipment operated within the organization of the Institute and the actual processing is done by the following data processor:

Name:	Institute for Foreign Affairs and Trade
Seat:	1016 Budapest, Bérc u. 13-15.
Tax number:	18869406-2-41
Contact:	info@ifat.hu
Representative:	Márton Ugródsy, director
and	
Name:	Global Systems Informatika Kft.

Seat: HU-1119 Budapest, Etele út 57/B.
Tax number: 23768208-2-13
Contact: info@globalsystems.hu; gdpr@globalsystems.hu,
Representative: ALT, Zoltán, manager
Activities: IT services,

4. Information on the location of cameras, their viewing angles, and the areas they cover

The Institute operates a camera surveillance system in accordance with its *‘Policy on the operation of cameras’*:

5. Defining the purpose of processing

The purpose of the camera surveillance systems operated at the Institute is to ensure the security of the Institute’s venues (conference room and workshop room) accessible to the public, as well as to protect the life, physical integrity and personal property of those using the Institute's services and events and those of the Institute's employees, external experts, interns and contractors.

6. Scope of processing, data sources, and legal grounds

For the purposes of the camera surveillance system:

- a) data processed: the data subject’s biometric data suitable for identification (e.g., the data subject’s image);
- b) data source: the data subject;
- c) pursuant to paragraph 6(1)a of the GDPR, processing is based on the consent of the persons in question granted by implication (when entering or staying in an area under surveillance), and pursuant to paragraph 6(1)f of the GDPR, the legitimate interest of the Institute. It is in the legitimate interest of the Institute to protect the safety of human life, physical integrity, personal liberty and property while the Institute is in operation through the surveillance of non-public facilities owned by the Institute.

7. Methods of data storage (equipment)

The camera surveillance systems operated by the Institute consist of indoor and outdoor cameras fulfilling general surveillance tasks, monitors in the janitor’s room for capturing images recorded by the cameras, and a central unit for electronically recording captured images.

8. Rules on access to data and duration of data processing

The real-time images transmitted by the surveillance system and displayed on the monitors may be viewed by the data controller’s director and chief operating officer or a person designated by them, the person operating the system (janitor) and his or her superior.

The recordings of the surveillance system shall be accessible only to the data controller’s director and chief operating officer or a person designated by them or, if used in a court proceeding or by another competent authority, the court or other authorized authority.

Data may be requested by a third party for the purposes of carrying out duties of the law enforcement, judicial or national security agencies as prescribed by law, i.e., to enforce the rights or legitimate interests of the investigating authority, law enforcement agency, prosecution, court, national security or anti-terrorism agencies, or a foreign authority under international legal assistance.

At the request of a court or authority, the data controller's director and chief operating officer or the staff designated by them shall send the recorded image to the requesting agency without delay.

Anyone whose right or legitimate interest is affected by the recording may, within three days of the recording, request that the Institute not destroy or delete the recording by providing evidence of his or her right or legitimate interest. However, in such cases also, the recording may only be handed over to a court or authority.

If not used, the recordings shall be destroyed or deleted no later than by the fourth day following the recording, and the Institute shall perform this obligation via automated settings.

The recording is considered used if the recorded image is used as evidence in judicial or administrative proceedings or submitted to a court or authority in such proceedings. If the recording is deleted, this fact shall be registered in a protocol, together with the date of the recording, by the member of staff performing the deletion and by his/her immediate supervisor.

A protocol shall be kept of the data retrieval and of the facts and circumstances of the data provided in reply to the request. The protocol is attached hereto as Annex 2 and contains:

- a) the name and address of the applicant (requester);
- b) the reason or purpose of the data retrieval (request) and the information justifying a legal or legitimate interest,
- c) data on the location of the surveillance system and of the image capture;
- d) the date and duration of the recording;
- e) the name and job of the person retrieving the data.

A copy of the protocol shall be sent to the person entitled to have requested the retention of the recording, while a copy shall be entered in the data transmission records as an attachment thereof, as specified in the Institute's Privacy Policy.

If, after a protocol has been recorded, no judicial or official request is made within thirty days of the date on which the application was received to omit the destruction or deletion of the video recording, and the three-day deadline from the date of the recording has passed, the recording shall be deleted or destroyed by the Institute.

9. Obligation to provide information on the operation of surveillance systems

The Institute shall inform the persons concerned clearly and in detail about the implementation of an electronic security system, in particular of the purpose of taking and storing images, the legal grounds of data processing, the storage location and its duration, the entity implementing the system (operator), the scope of persons entitled to access the data, and the provisions the laws and

regulations on the protection of personal data and on the publicity of information of public interest regarding the rights of the data subjects and the procedures for the enforcement thereof.

The Institute shall place prominent and visible warning signs and stickers with the following text in the areas to be monitored:

“Attention! Area under surveillance!”

Camera system operator/Data controller: Institute for Foreign Affairs and Trade

Seat of the controller: 1016 Budapest, Bérc utca 13-15.

Controller contacts: info@ifat.hu

Legal grounds for processing: The consent of the data subject and the legitimate interest of the controller

Purpose of processing: Protection of property under Art 31 of Act CXXXIII of 2005

Storage duration of recordings: 3 days

Storage place of recordings: The controller’s seat

Persons entitled to view the recordings: The controller’s director and chief operating officer, and the janitor

The Privacy Policy is available at: <http://kki.hu/hu/adatvedelem> “

5. Rights related to data processing

In the context of processing, the data subject may at any time, through the representative of the Institute:

- request information on processing and request access to the data processed;
- request rectification or completion of inaccurate or incomplete data;
- request the erasure of any data processed on the basis of consent;
- object to the processing;
- request restrictions of processing.

Unless restricted under a statutory interest, the data subject shall have the right to obtain from the Institute confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the following information:

- the purposes of processing;
- the type of authorization for processing (legal grounds);
- when and how such data are processed (duration);
- the type of data processed, along with a copy thereof;
- the recipients or categories of recipients of the personal data;
- transmission to third countries or international organizations;
- from which source the personal data originate, if not from the data subject;
- features of any automated decision-making, if applicable;

- the rights of data subjects;
- options of judicial remedies.

The Institute shall reply to requests for information and access within 25 days. The Institute may charge a reasonable fee based on administrative costs for additional copies of the processed personal data requested by the data subject.

In case of a request for the rectification (modification) of data, the data subject must verify the validity of the data and prove that the person requesting rectification is indeed the person entitled to do so. This is the only way the Institute can verify whether the new data is valid and, if so, to rectify the old one.

If it is not clear whether the data being processed is valid or accurate, the Institute will not rectify the data, but will only indicate that an objection has been lodged by the data subject but that the data may not be incorrect. After confirming the authenticity of the request, the controller shall rectify any inaccurate personal data or supplement the data covered by the request without undue delay. The Institute shall inform the person concerned of any rectification or marking.

In the event of a request for erasure or blocking, the data subject may request the erasure of his or her data, which means that the Institute is obliged to erase the data relating to the data subject without undue delay if:

- the personal data have been unlawfully processed;
- the Institute no longer needs the personal data for the purposes of the processing;
- the data subject withdraws consent on which the processing is and there is no other legal ground for the processing;
- the obligation to erase the data has been imposed on the Institute by legislation and it has not yet complied with it.

The data subject may request the restriction of processing, which the controller will comply with if any of the following are met:

- the accuracy of the personal data is contested by the data subject, where the restriction shall apply for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the Institute no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; so, the data subject has objected to processing.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. The Institute shall inform the data subject in advance of the lifting of the restriction on data processing.

If the data subject believes that processing violates the provisions of the GDPR or the Information Act, or if you object to the Institute processing your personal data, we recommend that complaints be first sent to the Institute. Your complaint will always be investigated.

The Privacy Policy of the Institute is available at <https://kki.hu/adatvedelem/>

If you have any questions or concerns regarding data processing, please contact us at info@ifat.hu

If, despite your complaint, you still object to the way the Institute processes your data or would like to contact the authorities directly, you may notify the *Nemzeti Adatvédelmi és Információszabadság Hatóság* (National Authority for Data Protection and Freedom of Information, 'NAIH') (Hungary, 1125 Budapest, Szilágyi Erzsébet fasor 22/c., mailing address: HU-1530 Budapest, Pf.: 5; E-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu).

You have the option of seeking judicial redress for the protection of your data, whereby the court shall hear such cases in priority proceedings. You are free to file a claim with the court of your domicile (permanent address) or your place of residence (temporary address) (see at <http://birosag.hu/torvenyszekek>).

To find the court with jurisdiction for your domicile or place of residence, please visit <http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso>.

6. Legal references

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("GDPR");
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

7. Closing provisions

This Notice shall enter into force on 1 April 2019 and shall remain in effect until revoked.

I hereby order this Privacy Notice to be implemented.

In Budapest, Hungary on 1 April 2019

UGRÓSDY, Márton, signed

Director