



# CCTV Privacy Note



## Introduction

Data protection is a key concern for Capgemini which has been placing this matter as a priority for long. Hence, transparency regarding the way we process the personal data we collect is a commitment for us. The information provided below intends to provide you all relevant information in relation to the collection and processing of information which may be collected through video surveillance system, (hereinafter, "CCTV").

Capgemini Services Romania s.r.l. (hereinafter, "we", "us", "our" or "Capgemini") may record and process personal data relating to you when you are at Capgemini premises.

Capgemini Services Romania s.r.l., with registered office at Bucharest, 4D Gara Herastrau Street, Green Court, 4<sup>th</sup> floor, 2<sup>nd</sup> District ("**Capgemini**"), is a Data Controller and Alina Vieriu (e-mail: [dpo@capgemini.ro](mailto:dpo@capgemini.ro)) is acting as Data Protection Officer, who is committed to ensuring that your privacy is protected.

## Processing of Your Personal Data

It is our legitimate interest to use video monitoring system on our premises for surveillance, security and protection of individuals, assets and data. CCTV monitors the entrances to Capgemini's offices.

According to the Data Protection Act, Art.5 of the Law no. 190/2018 regarding implementation measures of Regulation (EU) 2016/679, Capgemini consulted the employees' representatives for using CCTV.

## How long do we keep your data?

The retention period is proportionate with the purpose of processing, but not more than 30 days, except for situations expressly regulated by law or for duly justified cases.

## Sharing of your Personal Data

The access to the record is limited to authorised personnel only.

We may also be required – by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence— to disclose your personal data. We may also disclose your personal data if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

We may also disclose personal information if we determine in good faith that disclosure is reasonably necessary to protect our rights and pursue available remedies, enforce our terms and conditions, investigate fraud, or protect our operations or users.



## Your rights

### Right to access

You have the right to obtain confirmation from Capgemini as to whether or not your personal data are being processed. For video surveillance this means that if data is still being processed at the time of the request (i.e. if the data is stored or continuously processed in any other way), you should receive access and information in accordance with Article 15.

There are however, a number of limitations that may in some cases apply in relation to the right to access:

#### Article 15 (4) GDPR, adversely affect the rights of others

Given that, any number of data subjects may be recorded in the same sequence of video surveillance a screening would then cause additional processing of personal data of other data subjects. If data subject wishes to receive a copy of the material (article 15 (3)), this could adversely affect the rights and freedoms of other data subject in the material. To prevent that effect Capgemini should therefore take into consideration that due to the intrusive nature of the video footage Capgemini should not in some cases hand out video footage where other data subjects can be identified. The protection of the rights of third parties should however not be used as an excuse to prevent legitimate claims of access by individuals, Capgemini should instead implement technical measures to fulfil the access request (for example, image-editing such as masking or scrambling).

#### Article 11 (2) GDPR, controller is unable to identify the data subject

If the video footage is not searchable for personal data, Capgemini may be unable to identify you as the data subject.

For these reasons you as the data subject should (besides identifying themselves including with identification document or in person) in its request to us, specify when – within a reasonable timeframe in proportion to the amount of data subjects recorded – you entered the monitored area. We should notify you beforehand on what information is needed in order for us to comply with the request. If we are able to demonstrate that we are not in a position to identify you, we will inform you accordingly, if possible.

#### Article 12 GDPR, excessive requests

In case of excessive or manifestly unfounded requests from you as data subject, Capgemini may either charge a reasonable fee in accordance with Article 12 (5) (a) GDPR, or refuse to act on the request (Article 12 (5) (b) GDPR). We need to be able to demonstrate the excessive or manifestly unfounded character of the request.

### Right to erasure and right to object

If we continue to process personal data beyond real-time monitoring (e.g. storing) you subject may request for the personal data to be erased under Article 17 GDPR.

You have the right – at any time – to object, on grounds relating to your particular situation, to the processing in accordance with Article 21 GDPR. We may however provide compelling legitimate grounds that override your rights and interests of the data subject.

Capgemini is committed to keep personal data accurate. Capgemini shall you with access to your personal data to view, update or correct this information via request through email: [dpocapgemini.ro@capgemini.com](mailto:dpocapgemini.ro@capgemini.com).

## About Capgemini

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A global leader in consulting, technology services and digital transformation, Capgemini is at the forefront of innovation to address the entire breadth of clients' opportunities in the evolving world of cloud, digital and platforms. Building on its strong 50-year heritage and deep industry-specific expertise, Capgemini enables organizations to realize their business ambitions through an array of services from strategy to operations. Capgemini is driven by the conviction that the business value of technology comes from and through people. It is a multicultural company of 200,000 team members in over 40 countries. The Group reported 2016 global revenues of EUR 12.5 billion.

Learn more about us at [www.capgemini.com](http://www.capgemini.com)



**People matter, results count.**

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