

## **VIDEO SURVEILLANCE POLICY AT THE ESTONIAN ACADEMY OF MUSIC AND THEATRE**

### **1. Personal data controller**

The personal data controller is the **Estonian Academy of Music and Theatre** (hereinafter the Academy), registry code 74000547, address Tatari 13, 10116 Harjumaa, Estonia, info@eamt.ee. For questions related to the processing of personal data, please contact the data protection officer at andmekaitse@eamt.ee.

The Academy handles personal data with a high level of diligence based on the EU General Data Protection Regulation, the Estonian Personal Data Protection Act and the requirements set forth in the Security Act, as well as the recommended guidelines for the processing and protection of personal data issued by the Data Protection Inspectorate for the implementation of legislation. We store and process data fairly, transparently, and with respect to the individual and privacy rights of persons.

This privacy policy relating to video surveillance (hereinafter the Policy) has been made available at the Academy buildings at Tatari 13 and Toom-Kooli 4, on the [website](#), and with the help of a QR code.

This Policy applies to everyone who enters the video surveillance area and is captured on video footage.

### **2. The purpose of video surveillance and the basis for personal data processing**

The Academy uses a video surveillance system and processes personal data recorded by video surveillance for the protection of the property located in the Academy's buildings and on its territory, to ensure the passage and safety of people, to prevent any situations that threaten the preservation of property and the safety of people, to respond to emergency situations, to detect any offences, and to identify the person(s) who caused damage or committed an offence. The video footage enables proof of identity in the event of an offence.

The Academy collects and processes personal data on the basis of legitimate interest (GDPR Article 6(1)(c) and (e)). The Academy has thoroughly considered its own legitimate interests as well as the rights and privacy risks of data subjects, and has come to the conclusion that the Academy has a legitimate interest primarily in the protection of its property, the protection of people and the prevention of offences, which outweighs the interests, rights and freedoms of the data subject, and the impact caused by the processing of personal data to the data subject is proportional to the purpose sought.

### **3. Recording area**

The working areas of video cameras are outdoor areas, entrance areas, corridors, and lobbies. The use of video cameras on the territory or the premises of the Academy is marked by a relevant sign, where the necessary information and this Policy can be easily found using a QR code. The signs are located at the entrances to the Academy buildings at Tatari 13 and Toom-Kooli 4. It is important for the Academy that anyone entering the premises of the building knows about the video surveillance

even before entering and can therefore make an informed and voluntary choice about visiting the building.

#### **4. The personal data processed**

Using the video cameras installed in and outside the building, the Academy collects and processes only the image of the person within the range of the video cameras, recording the person's appearance and behaviour. No audio is recorded with the video footage.

#### **5. Processing period and storage of personal data**

Video footage is stored for up to 2.5 (two and a half) months, with the aim of clarifying and proving the circumstances for which the footage is made (e.g. to prove the circumstances of any security incidents within the range of the cameras to the body that initiated proceedings). If no requests for data storage have been received, the footage on the storage device will be automatically deleted after the end of the storage period, and cannot be restored or extracted afterwards.

On the basis of a legitimate request (e.g. in the event of a security incident and proceedings related to the protection of persons and property), the Academy has the right to retain the video footage *for longer* than 2.5 months, i.e. until there is no longer a justified basis in the proceedings of a specific case.

#### **6. Access to and transfer of personal data**

The Academy stores the video camera footage in an impersonal form on a storage disk with limited access, to which only the employee responsible for video surveillance at the Academy has access for the extent necessary to meet the purposes specified in this Policy.

The Academy may transfer video footage to the following third parties:

- to public authorities and to the court to whom the Academy is obliged to deliver video footage and/or personal data collected with the help of such footage based on the relevant legislation;
- to legal advisors who provide legal services to the Academy in connection with offences identified with the help of video footage;
- to the camera maintenance service provider, i.e. the IT service provider, to the extent necessary to verify the functionality of the camera or to identify and eliminate malfunctions.

#### **7. Safe storage of footage**

The Academy has taken the necessary organisational, physical, and IT security measures to ensure that the video footage and the personal data processed with its help are protected against any misuse, unauthorised access, disclosure, modification, or destruction.

To ensure the security of the personal data processed by the Academy, unauthorised persons are prevented from accessing the surveillance devices and the video surveillance system to prevent unauthorised monitoring, copying, modification, transfer, and deletion of footage.

Access to process personal data is granted only to employees who have received the appropriate training and who have the right to process personal data only to the extent necessary to achieve the purposes of personal data processing.

## **8. Inquiries regarding the processing of personal data**

The data subject has the right to view the data collected concerning them, including recordings of their image.

In the case of viewing a recording and receiving a copy of it, it must be taken into account that if there are other persons in the recording in addition to the person who wants to view their own data, access to the data of other persons may be allowed only with the written consent of the persons in the recording or by making the other persons unidentifiable.

Requests related to the processing of personal data should be submitted electronically with a digital signature to the Academy's data protection officer at [andmekaitse@eamt.ee](mailto:andmekaitse@eamt.ee). We will issue the data on the applicant either on paper (photos from the recordings) or electronically, as requested, either on a memory stick or via a secure cloud service.

The Academy will respond to requests within one (1) month of receipt. The Academy may reject a request if the applicant's personal data has been deleted due to the elapse of the storage period of the recording; if the identity of the applicant cannot be established, if the transmission of personal data is not secure, or if the requests are clearly unfounded or excessive, primarily due to their repetitive nature.

## **9. Rights of data subjects**

If, in the opinion of the data subject, the Academy processes their personal data contrary to the legislation governing the processing of personal data, the data subject has the right to contact the Data Protection Inspectorate:

Tatari 39, 10134 Tallinn

Tel. +372 5620 2341

Email: [info@aki.ee](mailto:info@aki.ee)

**Website:** [www.aki.ee](http://www.aki.ee)