

VIDEO SURVEILLANCE POLICY **FUNDATIA MATEAS (CAMBRIDGE SCHOOL OF BUCHAREST)**

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1. The legitimate reason and legal basis for video surveillance

The use of the video surveillance system is required to maintain an optimal social climate and to enhance safety, security and access control on the premises of FUNDATIA MATEAS (hereafter referred to as CAMBRIDGE SCHOOL OF BUCHAREST or abbreviated CSB), as set by the Law no. 333/2003 on the protection of objectives, goods, values and protection of persons and Government's Decision no. 301/2012 for the approval of the Methodological Norms for the application of Law no. 333/2003 on the protection of objectives, assets, values and protection of persons. Legal bases for personal data processing are represented by art. 6 para. 1 letter c) of Regulation (EU) 2016/679 - the *processing is necessary in order to fulfil a legal obligation incumbent on the controller* and art. 6 para. 1 (f) of Regulation (EU) 2016/679 - the *processing is necessary for the purpose of the legitimate interests pursued by the controller or a third party*.

Legal framework:

- a) Law no. 333 of July 8, 2003 on the protection of objectives, assets, values and protection of persons, as subsequently amended and supplemented;
- b) Decision no. 301 of April 11, 2012 for the approval of the Methodological Norms of Law no. 333/2003 on the protection of objectives, assets, values and protection of persons;
- c) Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 regarding 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 (General Data Protection Regulation);
- d) Guidelines issued by the European Data Protection Board on video surveillance;
- e) Law no. 190/2018 on measures implementing Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on protection of natural persons in regard to the processing of personal data and the free movement of such data and repealing Directive 95/46 / EC (General Data Protection Regulation).

2. The purpose and scope of the policy on video surveillance

CAMBRIDGE SCHOOL OF BUCHAREST operates a video surveillance system to prevent, deter, manage and investigate safety and security incidents, as well as for the protection of persons and/or property (fire, theft, burglary, assault or any other threat). The video surveillance system supports the achievement of common goals related to security and access, by monitoring specific areas and events. The system is one of the measures designed to support the security policies of CAMBRIDGE SCHOOL OF BUCHAREST.

The personal data controller for the video surveillance processing operation is CAMBRIDGE SCHOOL OF BUCHAREST.

This policy establishes mechanisms for using the video surveillance system, as well as the measures taken by Cambridge School of Bucharest in order to protect personal data and privacy of persons inside CAMBRIDGE SCHOOL OF BUCHAREST and in its immediate vicinity.

All elements of this surveillance policy are applicable in all spaces used by CAMBRIDGE SCHOOL OF BUCHAREST.

3. Ensuring the operation of the video surveillance system in accordance with the legal provisions regarding privacy and data protection

3.1. Review of the current system

The procedures of CAMBRIDGE SCHOOL OF BUCHAREST are regularly reviewed to ensure compliance with the provisions of 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 (General Data Protection Regulation).

3.2. Compliance

CAMBRIDGE SCHOOL OF BUCHAREST processes the images in accordance with the provisions of 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 (General Regulation on data protection) and Law no. 190/2018 on measures for the implementation of Regulation (EU) 20 16/679 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 these data and repealing Directive 95/46 / EC (General Data Protection Regulation).

3.3. CCTV system

The Closed- circuit television system (CCTV) of CAMBRIDGE SCHOOL OF BUCHAREST may be periodically subjected to a risk analysis for each surveillance camera. Based on their analysis and with the aim of minimising the monitoring of areas that are not relevant for the intended purposes, the location of the cameras and viewing angles may be modified, replaced or confirmed.

3.4. Transparency

The video surveillance policy is available and published on the CAMBRIDGE SCHOOL OF BUCHAREST website (www.cambridgeschool.ro).

3.5. Policy review

The system operator shall review the proportionality of the use of the video surveillance system on the protection of personal data every two years. During these regular reviews, we will appreciate whether:

- there is still a need for a video surveillance system;

- the system continues to serve its stated purpose;
- there are still no suitable alternatives.

This periodical review will cover also other issues identified during system operation, particularly if the present policy of CAMBRIDGE SCHOOL OF BUCHAREST for video surveillance continues to respect the legislation and instructions into force and if observed in practice.

3.6. Technological solutions that respect privacy

For all new equipment orders for the surveillance system and for its possible extension, CAMBRIDGE SCHOOL OF BUCHAREST will be using optimal technological solutions that are up to the standards and the ultimate available technologies.

4. Areas under surveillance

The location of surveillance cameras and their viewing angles are based on a risk analysis, ensuring that the cameras are oriented exclusively to the most important areas inside the building.

To monitor entry points and the premises of CAMBRIDGE SCHOOL OF BUCHAREST, video recording cameras are used. In addition, cameras are provided to monitor connection points, as well as the proximity of certain areas of major importance that do not require additional security, such as areas where values or sums of money are kept, as well as restricted access areas.

Areas likely to provide a higher degree of discretion, such as offices and medical offices, are not monitored. Areas likely to provide maximum discretion, such as toilets, changing rooms or other similar locations, are never monitored.

The monitoring of the outside perimeter of CAMBRIDGE SCHOOL OF BUCHAREST is limited to the minimum.

5. Categories of personal data collected and the purpose of their processing

5.1. Technical characteristics of the system

CAMBRIDGE SCHOOL OF BUCHAREST video surveillance system is a conventional system. All surveillance cameras operate 24 hours a day, 7 days a week. It captures digital recorded images, as well as the time and date. We do not use state-of-the-art technology or intelligent video surveillance, we do not interconnect our system with other systems, and we do not use external audio recordings or "CCTV with sound." However, video and audio sounds are captured in classrooms and other key areas.

5.2. The purpose of video surveillance

CAMBRIDGE SCHOOL OF BUCHAREST uses the surveillance system to ensure safety, security and access control. The surveillance contributes to controlling access to buildings and outside areas, and ensure the security and safety of buildings, staff and visitors, as well as goods and documents kept in offices.

The monitoring system is helping to prevent, deter, management and, if necessary, investigate incidents of safety and security, potential threats or unauthorised physical access, including unauthorised access to buildings or infrastructure.

5.3. Limiting the purpose

The system is not used for any other purposes than those mentioned above. For example, it is not used to monitor employee presence. The system shall not be used as an investigative tool for purposes other than those described above, except in the case of a physical safety incident or a criminal offense. Records may be submitted to investigative bodies in the framework of an official disciplinary or criminal investigation.

5.4. Webcams

CAMBRIDGE SCHOOL OF BUCHAREST does not use webcams for purposes related to ensuring safety and security.

5.5. Special categories of data

CAMBRIDGE SCHOOL OF BUCHAREST 's video surveillance system is not intended to collect special categories of data, such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or health or sexual orientation data. However, the system can store medical personal data in case among the visitors are observed persons with physical disabilities (i.e., those in wheelchairs or using access ramp designed thereof).

CCTV system monitors the minimum area required to ensure safety and security of the building. Given the high level of exposure of the CAMBRIDGE SCHOOL OF BUCHAREST building from a security perspective (the perimeter is easily accessible), the entrances and the perimeter of the CAMBRIDGE SCHOOL OF BUCHAREST are all equipped with surveillance cameras. The purpose of using these cameras is not to record or process special categories of data, nor to target an individual, but to be able to prevent, assess and investigate security incidents.

The operators of the monitoring systems are subject to regular briefings on data protection and fundamental rights.

6. The right of access to information and its beneficiaries

6.1. Internal security and maintenance staff

CAMBRIDGE SCHOOL OF BUCHAREST will be able to outsource its video surveillance system maintenance operations.

Recorded video images are accessible to employees in charge of video monitoring, based on the principle of need to know. Employees in charge of video monitoring have access to recordings only with the express consent of the management of CAMBRIDGE SCHOOL OF BUCHAREST and based on the confidentiality protocols concluded.

Downloading recordings to external media (such as DVDs or USB sticks) is always documented in special registers and can only be performed by CAMBRIDGE SCHOOL OF BUCHAREST video monitoring employees.

The maintenance of the video surveillance system is also performed by CAMBRIDGE SCHOOL OF BUCHAREST.

6.2. The right to access personal data

CAMBRIDGE SCHOOL OF BUCHAREST's security policy regarding video surveillance specifies and documents who has access to the video surveillance recordings and / or the technical architecture of the video surveillance system, for what purpose and what the respective access rights are. In particular, the document specifies who is entitled to:

- view images in real time;
- view recorded images;
- to copy;
- to download;
- to delete;
- to modify images.

The rights of access are established by the decision of the management of CAMBRIDGE SCHOOL OF BUCHAREST.

6.3. Training of staff on data protection

All staff with access rights, including security agents and maintenance technicians, receive data protection training.

6.4. Privacy commitments

Personnel with access rights, including external personnel performing CCTV or system maintenance operations, shall sign confidentiality commitments to ensure that they do not transmit, show or disclose to anyone in any way the content of video surveillance images, except authorised recipients.

6.5. Transfers, communications and registers

The information collected as a result of the processing of personal data, including CCTV images, may be communicated to the judiciary or law enforcement for investigation or prosecution. These transfers are only made upon request. There are no regular or routine transfers.

Likewise, persons who have suffered material damage within the premises of CAMBRIDGE SCHOOL OF BUCHAREST may request, on the basis of a written request, subject to the approval of the management, access to view the relevant video recordings of the incriminated deed.

7. Protection of personal data

In order to protect the security of the video surveillance system as a whole, including personal data, a number of technical and organisational measures are put in place.

All possible technical and physical measures shall be taken to ensure system security and data protection, inter alia:

- staff (external and internal) sign non-disclosure and confidentiality agreements;
- users are granted rights to access only those resources that are strictly necessary to be able to carry out their activity (based on the need to know);
- drawing up an updated list of all functions / positions that have permanent access to the system and describing their access rights.

8. Data retention

The retention period of images captured by the video surveillance system is 20 days. This retention period is essential for security investigations, because due to the presence of users in various places of activity, in many cases complaints are filed long after the incident.

If an image needs to be kept for further investigation or to provide evidence in the event of a security incident, it may be kept for the duration of the investigation and, if necessary, may be archived with the investigation for a period of time up to three years.

9. Providing information to the public

We provide to the public (the persons passing by the perimeter of the CAMBRIDGE SCHOOL OF BUCHAREST and / or the persons entering the premises of CAMBRIDGE SCHOOL OF BUCHAREST) with information on video surveillance effectively and in detail. To this end, we follow a multi-layered approach, which consists of a combination of the following 3 methods:

- on-site announcements to alert the public (passers-by, drivers, visitors, staff, etc.) to monitoring and providing essential information on processing;
- the availability of this video surveillance policy in the company's headquarters;
- the availability of this video surveillance policy on the CAMBRIDGE SCHOOL OF BUCHAREST website (www.cambridgeschool.ro), for people who want more details about our company's video surveillance practices.

10. Rights of access, rectification and deletion of personal data

The public has the right to access the personal data we hold about them and to correct and complete them. Any request for access, rectification and / or deletion of personal data must be submitted in writing to:

CAMBRIDGE SCHOOL OF BUCHAREST

Strada Erou Iancu Nicolae Nr. 126 C, Voluntari, Ilfov 077190

Email: office@cambridgeschool.ro

In addition, for any request regarding personal data, data subjects may directly contact our Data Protection Officer (DPO), using the following contact details:

DPO company name: BATTLEGROUP SRL

Email: dpo@battlegroup.ro

Website: www.battlegroup.ro

We will respond to requests in detail within 30 calendar days. If this is not possible, the applicant shall be informed of the subsequent steps and the reason for the postponement within 30 days. Even in the most complex cases, access or a reasoned final reply will be granted if the request is rejected, within a maximum of 3 months. All measures will be taken to respond earlier, especially if the applicant declares that the request is urgent.

If specifically requested, the applicant may obtain a copy of the recorded images, with anonymised images of any other people. In the case of such a request, applicants must prove their identity beyond any doubt and, whenever possible, to designate their identity, date, time, place and circumstances in

which they were filmed by the cameras. They must also provide their own recent photograph, which allows security personnel to identify them in the analysed images.