

DECISION № 351 Sofia, 16.01.2020 ON BEHALF OF THE PEOPLE ADMINISTRATIVE COURT - SOFIA-CITY, Second Department 59 panel, in a public session on 12.12.2019 in the following panel: JUDGE: Zornitsa Doichinova with the participation of Secretary Svetla Gecheva and with the participation of the prosecutor Milen Yuteroov, considering case number 11621 on the inventory for 2019 reported by the judge, and in order to rule took into account the following: The proceedings in the case are under Art. 38, para 7 of the LPPD, supra art. 145 APC. The proceedings were instituted on the basis of a lawsuit filed by C.J.D. and V.N.D. L. appeal against Decision № PPN-01-1015 / 18 of 11.09.2019 of the Commission for Personal Data Protection, in the part in which the appeal from C.J.D. and V.N.D. to the CPDP is declared unfounded and disregarded, as it was accepted as established that no violation of the principles related to the processing of personal data, enshrined in Art. 5, § 1, b. "B" and b. "C" of EU Regulation 2016/679 by VP and SV by conducting video surveillance with cameras installed at the entrance to the condominium (cameras № 2, 3, 4, 5, 6, 7, 8 ). The appeal sets out considerations of illegality of the contested decision due to its contradiction with the substantive provisions. It is alleged that the decision is based on false factual findings due to obvious errors made by the Commission in drawing its conclusions. It is pointed out that the minutes of the general meeting were drawn up only for the purposes of the proceedings before the CPDP. It was not clear from the decision which cameras had been replaced, which technical parameters they met, as well as where to be located and who had access to the video surveillance system. They claim that the protocols presented in the file by the General Assembly of the EU from 2014 were drawn up for the purposes of the proceedings before the CPDP. However, it cannot be deduced from them whether the residents have consented to the installation of video surveillance. As the EU Governor is not registered in the Sofia Region T., the meetings convened by him do not meet the requirements of the ZUES, and the decisions taken by them are null and void. As there is no registered recorder of personal data for the current video surveillance system, it is not clear who has access to the cameras, whether recordings are made from them, for how long they are stored and whether they are destroyed afterwards. It was not clear why changes were made to the video surveillance system in 2014, and only in 2018 warning stickers were placed. He asks for the annulment of the decision in the contested part. Expenses are claimed. In a court hearing, through his legal representative, Atty. L. upheld the appeal and sought the annulment of the contested decision. He further stated that the main argument of the CPDP to reject the complaint was that for the video surveillance system installed at the entrance of the applicants, there was a decision of the General Assembly at the entrance. He claims that there is no invitation to convene this general meeting, and it is not clear in advance what the agenda was, whether it was held with the

required quorum, signed by three people, and the minutes claim that 11 families were present. Defendant The Commission for Personal Data Protection in a court hearing through its legal representative Yuk G. expressed an opinion that the complaint was unfounded and asked the court to issue a decision rejecting it. He claims to be awarded legal fees. Interested party S. S. V. did not express an opinion on the appeal and was not represented at the hearing. The interested party VPP did not express an opinion on the appeal and did not represent himself at the hearing. Prosecutor Yu. From the SGP expressed an opinion on the merits and proof of the complaint. Administrative Court Sofia-city, in the current court panel, after discussing the arguments of the parties and assessing under Art. 235, para. 2 of the Civil Procedure Code, in conjunction with Art. 144 of the APC, the written evidence accepted in the case is accepted as established by the factual side: The proceedings before the Commission for Personal Data Protection were initiated on a complaint Reg. and V. N. D. for violation of the LPPD. The specific violations indicated in the document initiating the administrative proceedings are illegal installation of eight video surveillance cameras by their neighbor SV, the first camera covering the block, the street and both sidewalks, the second is installed at the entrance to the yard, the third also observed the courtyard, the fourth is mounted opposite the front door of the block, the fifth mounted on the ground floor, the sixth mounted on the second floor, the seventh on the third floor and the eighth mounted on the fourth floor. It is stated that no consent was given for the installation of these cameras, the decision was not taken at a general meeting, and the last elected manager was VP. admissible. With a letter of ref. № PPN-01-1015 / 2018 # 6 of 23.04.2019, the CPDP has notified SV of the complaint filed against him, giving him the opportunity to express an opinion, as well as notified him of a scheduled open meeting, which will be held on June 19, 2019. The letter was received on May 2, 2019, as evidenced by the attached notice of delivery /p.74/. With a letter of ref. № PPN-01-1015 / 2018 # 7 of 23.04.2019 for the initiated proceedings and the filed complaint was notified and VP, and he was also given the opportunity to comment. In an opinion from SV, presented to the CPDP with a letter № PPN-01-1015 # 9 (18) /08.05.2019, he stated that he was an investor in the block and when buying the property the D. family were acquainted with the intention to build a video surveillance system at the entrance, which was done in 2002, and they gave their verbal consent. A protocol for consent was prepared for the subsequent replacement of the cameras, after a general meeting was held on July 21, 2014, which showed that 93.97% of the owners of ideal parts at the entrance agreed with this, except for the D family. all this was placed in a prominent place at the entrance information sheet from 25.05.2018 with detailed information and signs indicating that constant video surveillance is carried out. A company was hired for the replacement and expansion. He, I. Ts. And B. D. had access to the system. that the

complaint to which he should reply was not attached to the letter previously sent to him. For this reason, a new letter was sent with ref. № PPN-01-1015 / 2018 # 10 / 16.05.2019 by the CPDP, which was received on 20.05.2019, as evidenced by the delivery notice. With a letter of ref. № PPN-01-1015 / 2018 # 1 / 16.05.2019, the CPDP has requested from P. to present the following documents: minutes of the general meeting for election of a manager; documentation for the installation of video surveillance and acquaintance of property buyers with it; when the system was first introduced; protocol for initial installation of the video surveillance system; rules on video surveillance and access to cameras; technical specifications. There is no evidence on the part of P. that these documents were sent. Attached to the file is the minutes of a general meeting at [residential address] held on 21.07.2014, at the entrance of the block, from 7.30 pm, at which VP was elected EU Governor, S.V. for cashier, and B. D. for member. It was also decided to draw up a protocol of written consent / or disagreement / for the reconstruction and expansion of the existing video surveillance and control system, and each of those present at the meeting certified his signature. The protocol for consent after the general meeting held on 21.7.2014 was added, in which the numbers of the apartments in entrance 8 and the families, owners of the apartments, together with the percentage, common parts they own to the respective apartments are written in tabular form. . Surprisingly, 11 out of 12 families agreed. Only the D. family did not sign and did not take a stand on the issue of reconstruction and expansion of the existing video surveillance and control system. In order to clarify the circumstances of the complaint, the CPDP requested from the mayor of the T. district information from the regional register of condominiums, located in [settlement], [residential district], [residential address] ent. "IN". In the received reply letter № PTP19-Дн05-281- [1] it is stated that there is no registered manager or management board for the condominium in question. By Order № RD-15-125 / 25.04.2019, the Chairman of the CPDP has ordered an inspection to establish whether a video surveillance system has been built in the said residential building. A commission has been appointed to carry out the inspection. The order was served on the day of the inspection, May 27, 2019, personally to SV and VP. in the condominium, located in [settlement], [residential district], [residential address] ent. "IN". For the inspection they drew up a statement of findings, which states that in a separate room - porter, located on the ground floor at the entrance, there is an Internet router and D. H., model DS-7208HGHI-SH / A (B), which includes eight pieces. cameras, for which there was no documentation available for the installed system and the technical characteristics of the cameras. There was no camera monitor in the porter's room. It is stated that SV and BD did not have remote access to the video surveillance system, did not have passwords for the system and that such access was available only to IC, the owner of an apartment who did not live

there and with whom he did not a connection could be made to obtain information. The scope of the video cameras was not established as access to the system was not granted to the inspection bodies. According to the information received, the system made recordings, which it stored for up to 15 days depending on the traffic in front of them. Eight cameras were found as follows: Camera 1: mounted to the right of the front door of the block on the outside, in the scope of the public sidewalk and street; Cameras 2 and 3: mounted on the outer rear walls of the block, which includes a public yard - parking of the whole block; Chamber 4: mounted inside the entrance, opposite the front door; Camera 5, 6, 7, 8: installed on the ground, second, third and fourth floors, respectively, located in the common staircase parts of the entrance above the doors of the apartments. For the cameras, information stickers were placed on the door of the unit for video surveillance, as well as information related to the system. The protocol of the inspection was handed over personally against the signatures of SV and VP. of the statement of findings drawn up on 27.05.2019. On 19.06.2019 an open meeting of the Commission was held, at which the complaint of the D. family was considered on the merits, for which a report was prepared № 26. Based on the evidence gathered, The Commission for Personal Data Protection has ruled the disputed Decision № PPN-01-1015 / 2018 of 11.09.2019, which on the basis of Art. 38, para. 3 of LPPD has upheld as a well-founded complaint with registration № PPN-01-1015 / 11.12.2018 by Ts. (Camera № 1 according to KA № PPN-02-313 / 30.05.2019), installed to the right of the front door of the block - outer wall, front of the condominium, which includes public spaces, in violation of Art. 5, § 1, b. "B" and b. "C" of EU Regulation 2016/679. The complaint of the D. family was disregarded in the rest of it. The decision was served on the parties to the case, and the applicants were served on 16.09.2019. 146 of the APC, by the order of art. 168, para. 1 of the APC, reached the following legal conclusions: The subject of dispute is Decision № PPN-01-1015 / 18 of 11.09.2019 of the Commission for Personal Data Protection, in the part in which it is accepted as established that it is not committed violation of the principles related to the processing of personal data, enshrined in Art. 5, § 1, b. "B" and b. "C" of EU Regulation 2016/679 by VP and SV by conducting video surveillance with cameras installed at the entrance to the condominium (cameras № 2, 3, 4, 5, 6, 7, 8 ). The complaint was upheld with regard to video surveillance with a first camera, according to CA № PPN-02-313 / 30.05.2019), mounted to the right of the front door of the block - outer wall, front of the condominium, which includes public spaces. In this part the decision is not contested, which is why it came into force. The complaint was filed by persons who have a legal interest in challenging the act, as the complainants are the persons who submitted the signal to the CPDP, due to which the act affects their rights and legitimate interests. The appeal is within the term for appealing the individual

administrative acts, for which proper evidence has been presented. The complaint is directed against a challenging administrative act. According to the requirements of art. 168, para. 1 of the APC, in the official and comprehensive judicial review of legality, the court performs a full inspection of the appealed administrative act on its validity, compliance with procedural and substantive provisions for its issuance and whether it is consistent with the purpose pursued by law, ie all grounds referred to in Art. 146 of the APC. In its assessment, the court proceeds from the legal and factual grounds specified in the disputed individual administrative act, the submitted administrative file and the evidence gathered in the case. In examining the administrative act, the court is not bound by the grounds introduced by the appellant or by his request. The court should also annul or annul the act if it finds a defect that the appellant has not indicated. In accordance with the procedural law. The disputed act was issued by the competent authority, within the scope of its powers, according to Art. 38, para. 3, in conjunction with Art. 10, para. 1, item 7 of the LPPD. As a collective body, the Commission has taken the procedural decision in the presence of the required quorum and majority, according to Art. 8, para. 6 and, para. 7 of the Rules of Procedure of the CPDP and its administration (PDKZLDNA), evident from the minutes № 26 / 19.06.2019, at which meeting the complaint was considered on the merits, in the presence of three members, ie. there is a quorum required for the meeting and the decision is taken unanimously by all present. According to the provision of art. 38, para 3 of LPPD, in case of a complaint submitted to CPDP by the data subject, who considers that his rights under Regulation (EU) 2016/679 and under LPPD have been violated, the commission shall issue a decision and may apply the measures under Art. . 58, § 2, letters "a" - "h" and "j" of Regulation (EU) 2016/679 or under Art. 80, para. 1, items 3, 4 and 5 and in addition to these measures or instead to impose an administrative penalty in accordance with Art. 83 of Regulation (EU) 2016/679, as well as under Chapter Nine. That is, insofar as the commission has been seised by a person who believes that his rights under the LPPD have been violated by having illegal access to his personal data, it is within its powers to rule with a decision that is subject to challenge by the administrative court. . The administrative act is issued in the required written form. The decision contains all the required details provided in Art. 59, para. 2 of the APC, including the factual and legal grounds for its issuance. The will of the body is objectified in the operative part, as the decision corresponds to the stated reasons. Indeed, in the dispositive part of the decision is written a complaint with registration № PPN-01-1015 / 11.12.2019, and not a complaint with registration № PPN-01-1015 / 11.12.2018, but the same is a technical error , insofar as from the collected and verified evidence in the case and from the stated reasons in the circumstantial part of the procedural act, the actual description of the complaint is unambiguously clear. The existence of

a defect in the form of the act, representing an independent ground for its revocation within the meaning of Art. 146, item 2, supra art. 59, para. 2, item 4 of the APC. The decision was issued in the absence of violations of the administrative procedure rules, which should be qualified as significant within the meaning of Art. 146, item 3 of the APC and to determine its repeal. The current panel of judges maintains that the violation of the rules of administrative procedure is significant only when it has affected or could have affected the final decision on the merits of the administrative body. The proceedings were initiated by the applicants C.J.D. and V.N.D., who set out considerations for violations committed by S.V. in the condominium where they live. A file was opened on the complaint, of which SV and the condominium manager VP were informed, a study was conducted, written evidence was collected, an open meeting was held, of which the parties were regularly notified, and at which SV was present, after which, after clarifying the complaint on the factual side, the commission, at its meeting, took its decision, issuing an explicit written act - a decision in which it set out its considerations and its final decision. In view of the above, the present panel accepts that no significant procedural violations leading to its annulment have been committed during the adoption of the decision. In accordance with the substantive law. Considered on the merits, the complaint is unfounded. The LPPD regulates the protection of the rights of individuals in the processing of their personal data. Its main purpose is to ensure the privacy of individuals and privacy by ensuring the protection of individuals in the event of improper processing of related personal data in the process of free movement of data. According to the legal definition of Art. 4, para. 2 of Regulation 2016/679, "processing" means any operation or set of operations carried out with personal data or a set of personal data by automatic or other means such as collecting, recording, organizing, structuring, storing, adapting or modifying, retrieving, consulting, use, disclosure by transmission, dissemination or other means of accessing data, arranging or combining, restricting, deleting or destroying. According to the provisions of Art. 5 Regulation 2016/679, personal data should be processed lawfully, in good faith and in a transparent manner with regard to the data subject ("lawfulness, good faith and transparency"); to be collected for specific, explicitly stated and legitimate purposes and are not processed further in a manner incompatible with those objectives; further processing for archiving purposes in the public interest, for scientific or historical research or for statistical purposes shall not be considered, in accordance with Article 89 (1), incompatible with the original objectives ("limitation of objectives"); be appropriate, relevant and limited to what is necessary for the purposes for which they are processed ('minimizing data'); be accurate and, if necessary, kept up to date; all reasonable steps must be taken to ensure the timely erasure or correction of inaccurate personal data, taking into account the purposes for which they are processed

("accuracy"); be kept in a form which permits identification of the data subject for no longer than is necessary for the purposes for which the personal data are processed; personal data may be kept for a longer period, provided that they are processed solely for archiving purposes in the public interest, for scientific or historical research or for statistical purposes in accordance with Article 89 (1), provided that appropriate technical and organizational measures provided for in this Regulation in order to guarantee the rights and freedoms of the data subject ("storage restriction"); be processed in a way that ensures an adequate level of security of personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, applying appropriate technical or organizational measures ("integrity and confidentiality"). In the provision of art. 4, item 7 of Regulation 2016/679 stipulates that the controller of personal data is a natural or legal person, public body, agency or other structure that alone or jointly with another determines the purposes and means of personal data processing, when the purposes and the means of such processing shall be determined by the law of the Union or the law of the Member State. Item 8 of the Regulation also contains the definition of "processor of personal data", namely: "natural or legal person, public authority, agency or other entity that processes personal data on behalf of the controller". In this sense, in order for one person to be responsible for processing another person's personal data in violation of the LPPD and Regulation 2016/679, the person who uses data illegally should have the status of "controller" or "processor of personal data". This also follows directly from the provision of Art. 5, § 2 of the said Regulation, which stipulates that the administrator is responsible and able to prove compliance with paragraph 1, which is considered to be violated in the present case. In this respect, not only is it not proved in an indisputable and categorical way by the presented evidence that the established principles in art. 5, § 1, b. "A" - b. "E" of EU Regulation 2016/679, and there is no evidence that some of the persons - SV or VP have the status of "controller" or "processor of personal data", and therefore can not be held liable . The data controller determines the purposes and means by which personal data are processed. This status should derive from the law or from the activity carried out. With regard to VP, a protocol of a general meeting was attached to the case, with which under item 1 P. was elected manager of the condominium in which the video surveillance cameras are located. Indeed, the obligation to notify the district administration according to Art. 46b of ZUES for the election of a manager, which is also established by the attached letter with registration № PPN-01-1015 # 14 (18) /06.06.2019 by the mayor of Sofia, district "T." that he had not been elected condominium manager, as the applicant considered. Failure to notify is a violation of ZUES, which is established in another order. Nevertheless, VP performed the functions of a manager in accordance with the decision of the General Assembly, by which he was elected. In

this regard, the status of "administrator" should be noted that nowhere in the ZUES is it written that the manager of the condominium has the status of "administrator". However, in connection with his activity, it is possible that the manager has a similar status, as long as he has the personal data of individual apartment owners and implements the decisions of the general meeting. In the present case, however, P. was not charged with the reconstruction and expansion of the video surveillance system, but only with the preparation of a protocol for giving consent by the residents at the entrance item 2 of the attached minutes of the general meeting. However, even if the same on a general basis implements the decision of the General Assembly to expand the scope of the installed cameras / Cameras № 2,3,4,5,6,7,8 / S. V., as well as P., do not have with remote access to the video surveillance system, do not have passwords to log in to the system. It was established that such access is available only to IC, the owner of an apartment who does not live there, and with whom the administrative body has failed to establish contact in order to obtain information. That is, IC is the person who determines the purposes and means for processing personal data and processes them together. It has also not been conclusively proven that V. and P. have independent access to the video surveillance system, contrary to what they claimed before the inspection of the CPDP officials. The latter is set in the protocol of 27.05.2019 and the statement of findings with registration № PPN-02-313 / 30.05.2019, which are attached to the case. They are official documents that the court must comply with. These objective facts lead to the conclusion that neither SV nor VP carried out an activity that involves carrying out operations for processing personal data, insofar as during the inspection by CPDP officials in the separate room at the entrance were not open monitors reproducing camera recordings. Moreover, contrary to their original assertions, V. and D. did not have the passwords to access the videos stored on the hard disk of the DH recorder, model DS-7208HGHI-SH / A (B), to which they are included. the eight cameras. Such access is not provided to officials either. Therefore, there is no way for V. and P. to have the status of administrators, which status derives precisely from the activity carried out, which was established that they do not carry out - by video surveillance. There is no evidence that video surveillance is otherwise carried out by these individuals. In view of the described factual situation, the commission correctly and lawfully decided that there was no violation by the said persons of the LPPD, after proving that they do not determine the purposes and means for processing personal data and do not carry out activities related to processing of personal data. The opposite would mean issuing a decision based on assumptions and not on objective facts relevant to the case, which is unacceptable. But even if this was not the case, the court considers that the hypothesis presented falls within the exception of Art. 6, § 1, b. "E" of Regulation 2016/679, which states: "the individual



concerned has unambiguously given his consent." Indeed, this provision is in the singular and such consent is lacking on the part of the applicants, but all other residents of the condominium have given their consent, which is why there is a legitimate reason for the processing of their personal data. A protocol for this is attached to the case. The envisaged hypothesis of implemented video surveillance in residential buildings in condominium regime is established in the provisions of Art. 11, para. 1, vol. 10, p. "A" and Art. 17, para. 3 of ZUES, which establish the powers of the General Assembly as a governing body. According to Art. 11, para. 1, vol. 10, p. "A" of ZUES, the general meeting adopts a decision to incur expenses necessary for the maintenance of the common areas. The norm of art. 17, para. 3 of the ZUES stipulates that the said decision is taken by a majority of more than 50 percent of the presented ideal part of the common parts of the condominium. The same majority is defined in Art. 17, para. 2, item 6 of ZUES, for making a decision for installation of advertising or technical facilities on the building, etc. The arguments and motives of the administrative body stated in the appeal justify the existence of a dispute between the parties regarding the facts established during the administrative proceedings regarding the validity and legality of the decision, objectified in a protocol of 21.07.2014 of the condominium. A protocol from the residents for giving consent for expansion of the existing video surveillance system and a protocol from 21.07.2014 of the General Assembly of the condominium are attached to the case, as in item 2 of it an objectified decision is given video surveillance with cameras. It is stated that 11 families present voted for the decision, which makes up 93.37% of the id. from the common parts, according to a protocol of consent signed by 11 representatives of the families. The protocol was drawn up in 2014, but this does not make it invalid, as the consent was expressed clearly and unambiguously by the voluntary signature of the residents at the entrance. It should be challenged in connection with the decision of the general meeting or in proceedings to establish an incorrect document, which has not been done. That majority was not disputed by the applicants. The challenge was initiated both in the administrative proceedings and in the present court proceedings, several years after the decision of the General Assembly was taken. The procedure for contesting the illegality of a decision of the General Assembly of the EU is established in the norm of Art. 40 of ZUES, according to which each owner may request revocation of an illegal decision of the general meeting by submitting an application within 30 days of receipt of the decision under Art. 16, para. 7. The district court at the location of the condominium is competent to rule on it. There is no evidence in the case to challenge the decision taken to conduct video surveillance under the relevant legal order before the district court at the location of the condominium, given that this decision should be considered effective. In view of the specific procedure thus established for challenging the legality of the decisions of

the EU General Assembly, the current panel of judges finds that it is not competent to exercise control, even incidental, over its legality in the present court proceedings. In view of the above, the opinion should be expressed that the decision of the General Assembly to install CCTV cameras was lawfully taken. This means that P., in his capacity as manager, acted and executed a valid decision, and the observation pursued a legitimate aim - to protect the interests of other residents of the condominium. In this sense, in order for the processing of personal data to be lawful, firstly, the controller or the third party to whom the data is disclosed must pursue legitimate interests, secondly, the processing of personal data is necessary for the legitimate interests pursued and thirdly, the fundamental rights and freedoms of the person enjoying data protection priority over the legitimate interests pursued (decision of 4 May 2017, Rogas satiksme, C-13/16, EU: C: 2017: 336, vol. 28). According to the case law of the Court of Justice weighting of the conflicting rights and interests in question is required, which principle depends on the circumstances of the case and within which the person or institution carrying it out must take into account the importance of the rights of the individual concerned under Articles 7 and 8 of the Charter (decision of 24 November 2011, Asociación Nacional de E. F. de C., C-468/10 and C-469/10, EU: C: 2011: 777, paragraph 40). In this sense, the introduction of a system for video surveillance such as that at issue in the present proceedings, installed in the common parts of the residential building pursuing legitimate interests, with the consent to all residents of the condominium, only without the consent of the applicants, such as the processing of personal data through the video surveillance system meets the specified conditions is allowed and legally. In this case, the processing of personal data is justified because although the applicants did not expressly consent to their processing, the violation of their personal rights is assessed in view of their opposition to the interests of the other residents at the entrance who wish and have declared in writing consent to the installation of cameras at the entrance. In the case of the application of Regulation 2016/679 should infringe on the rights of the individual

assessed in relation to the defensible interests of others. Therefore, and

the processing of personal data appears to be lawful in the present case.

In view of the above, the present panel does not find grounds for annulment of

the contested decision, with the result that the action should be dismissed and the decision should be dismissed confirm.

At the expense of:

The applicants should not be ordered to pay the costs.

In the light of the outcome of the dispute, the defendant must be ordered to pay the costs

legal fees. In determining its amount, the court took into account

the provision of art. 78, para. 8 of the Civil Procedure Code, in connection with Art. 143, para. 4 and Art. 144 of the APC, supra.

Art. 37, para. 1 of the Legal Aid Act and Art. 24 of the Ordinance on payment of

legal aid, considering that remuneration should be awarded in the amount of

BGN 100.00

Thus motivated and on the grounds of art. 172, para 2 and art. 173, para 2 of the APC, the court

RESOLVED:

DISMISSES the appeal of C.J.D. and V.N.D. against Decision № PPN-01-1015 / 18

of 11.09.2019 of the Commission for Personal Data Protection, in its appealed part, p

which the complaint from C.J.D. and V.N.D. to the CPDP was declared unfounded and left

without respect, having been found not to have infringed

the principles related to the processing of personal data, enshrined in Art. 5, § 1, b. "B" and

b. "C" of EU Regulation 2016/679 by VP and SV by implementing

video surveillance with cameras installed at the entrance of the condominium (cameras №

2, 3, 4, 5, 6, 7, 8).

ORDERS C.J.D. and V.N.D. to pay the Commission for Personal Data Protection

the amount of BGN 100.00, representing costs of the case.

THE DECISION is subject to appeal, with a cassation appeal, before the Supreme Court  
administrative court, within 14 days of its announcement.

A copy of the decision to be sent to the parties to the dispute.

JUDGE: