AUTHORIZATION No. 7252/2018

The entity AZEOL - SOCIEDADE DE AZEITES E ÓLEOS ESTREMADURA SA., notified the CNPD a processing of biometric data whose purpose is to control the attendance of workers.

The treatment processes the following data: Name / Employee No. / Time / ADMISSION DATE

The face recognition template is registered, resulting from algorithmic interpretation of physiometric points, which is stored in a local terminal.

The information is processed in a central system with a single establishment, being accessible in NATIONAL ROAD 8 - KM 48.8 VALE ROSAS 2560-236 TORRES VEDRAS

There is no Workers' Commission.

The CNPD has already commented on the principles applicable to the processing of biometric data for access control and attendance of workers in its Determination of 26 February,

2004, as well as on the legal framework, the grounds for legitimacy and the measures to be taken.

take for correct compliance with the Data Protection Act. From these principles, the following treatment limits:

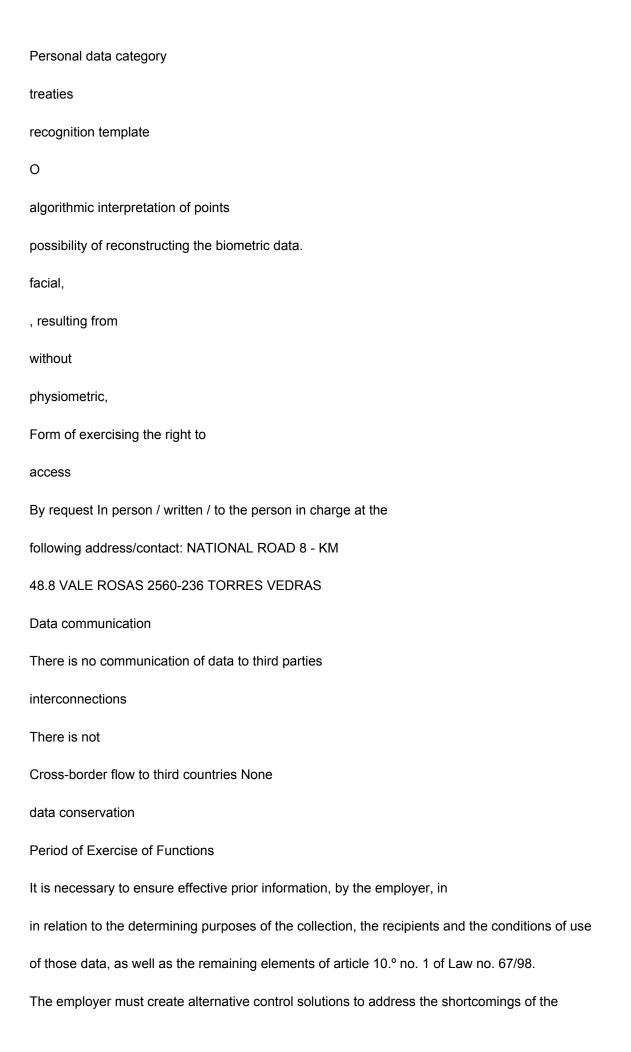
The reversal of biometric data is not allowed, that is, the decoding and reproduction of the

☐ The reversal of biometric data is not allowed, that is, the decoding and reproduction of
image of the biometric feature.
☐ The processing must be carried out with respect for privacy (Article 2) and for
specific, explicit and legitimate purposes (art. 5, no. 1 al. b); the data must be
adequate, relevant and not excessive in relation to the purpose and proportionate with
objectives to be achieved (art. 5.° n.° 1 al. c)
☐ The biometric data capture operation cannot be carried out in violation of the
personal identity of the worker (art. 26 of the CRP), with injury to his physical integrity
(art. 25.° no. 1 of the CRP) or with an intrusion into the privacy of private life.

☐ The collection operation cannot be translated into discrimination or violation of the duty of

respect and dignity of the worker.
☐ False rejection and acceptance rates must be adequate to the pursuit of the purpose
declared.
☐ Biometric information cannot be used for any purpose other than the
attendance/access/attendance and access control.
Since the biometric data is an adequate means to ensure a "legitimate purpose" of the entity
employer - attendance/access/attendance and access control - considers the CNPD that the
use of this technology does not involve any violation of the personality rights of the
worker.
The data collected is necessary for the purpose it is intended to achieve - the control of
attendance – not appearing to be excessive. No data other than
those expressly authorized.
The equipment for reading biometric data, because the purpose is to control the
attendance, cannot be located in a way that could be used as a means of controlling
the movement of workers within the premises.
The basis of legitimacy for the processing of data for the purpose of controlling
attendance/accesses/assiduity and accesses has as its source the forecast of article 6.° al. e) of the Law
67/98, since the processing is carried out in the "pursuance of the legitimate interests of the person responsible".
Thus, with the limits set, the treatment notified under the provisions of
articles 6, paragraph e), 27, n° 1, 29 and 30, n° 1 of Law 67/98, of 26 October, amended by Law
103/2015, of August 24, in the following terms:
Responsible
AZEOL - SOCIEDADE DE AZEITES E ÓLEOS ESTREMADURA SA.
Goal
assiduity

Name / Employee No. / Time / ADMISSION DATE



system, especially those resulting from false rejection rates or inability to

for the worker to present his biometric data for authentication or

recognition

The data subject may – when there are substantial and legitimate reasons relating to his/her situation

(cf. article 12.° al. a) of Law 67/98) – exercise the right of opposition in relation to the

treatment. In this case, you must present the grounds on which the right of opposition is based,

it is up to the person in charge to appreciate them, and the CNPD may ultimately intervene in the assessment and

weighting of the interests involved (cf. article 6.° al. e) and 12.° al. a) of Law No. 67/98).

Lisbon, 24-05-2018

The president

Filipa Calvão