

AUTHORIZATION No. 7238/ 2018

Euronet 360 Finance, Branch in Portugal, credit institution/financial company, notified a processing of personal data resulting from video surveillance, with the purpose of protecting people and property, to be carried out at its premises at R Convento Trindade, Bloco J - Lj 26 8600-540 Lagos

The system consists of 2 cameras, placed in the following locations:

Safe area / ATM's area / Technical areas /

There is visualization of the images in real time.

There is transmission of the images to the outside of the place of installation of the system.

There is no Workers' Commission.

The CNPD has already commented in its Deliberation No. 61/2004, of 19 April 1 on the guiding principles for correct compliance with the Data Protection Law, in terms of video surveillance, as well as the general conditions applicable to the processing of data. for the purpose of protecting persons and property. From these principles, as well as from the labor law and jurisprudence, the following limits to treatment:

- Sound collection is not allowed;
- The collection of images must be confined to the property of the person in charge, and cannot cover images of public roads or neighboring properties;
- In the case of ATM payment terminals, the cameras cannot be directed so as to capture the typing of codes;
- Cameras cannot regularly focus on workers during their work activity, nor can the images be used to control the activity of workers, either to assess productivity or for the purposes of disciplinary accountability (cf. Articles 20 and 21 of the Labor Code);
- Only the collection of images in the declared places is covered by this authorization, and under no circumstances can images of access or interior of sanitary facilities, meeting rooms, interior of offices and back of the workstation 'boxes' be collected.

The treatment under analysis, with the aforementioned limitations, is adequate, relevant and not excessive in view of the stated purpose (cf. subparagraph b) of paragraph 1 of article 5 of Law 67/98, of 26 October, amended by Law No. 103/2015, of August 24 - LPD) and the activity developed.

The processing of personal data carried out within the scope of video surveillance falls within the concept of

1 Available at [www.cnpd.pt/bin/orientacoes/principiosvideo.htm](http://www.cnpd.pt/bin/orientacoes/principiosvideo.htm)

privacy, provided for in paragraph 2 of article 7 of the LPD. Article 8(1) and Article 31 of Law no. 34/2013, of 16 May, constitute the foundation that legitimizes the installation of these systems.

Thus, with the limits set, the treatment notified under the provisions of Articles 7(2), 28(1)(a), 29 and 30(2) is authorized. 1 of the LPD, in the following terms:

Responsible Euronet 360 Finance, Branch in Portugal

Purpose Protection of people and property

Category of personal data processed Images captured by the system.

How to exercise the right of access By written request/ to the person in charge at the following address/contact: Av. D. João II, 46, 5º B Parque das Nações 1990-095 Lisbon

Communication of images Images may only be transmitted in accordance with the criminal procedural law. Once a possible criminal offense is detected, the person responsible must, together with the participation, send the collected images to the judicial authority or to the competent criminal police body. In other situations in which the authorities request access to the images, this can only occur, within the scope of a duly identified judicial process, in compliance with a reasoned order of the competent judicial authority. Outside these conditions, the person responsible cannot communicate the images.

Interconnections None

Cross-border flow to third countries None

Data retention 30 days

Any person covered by the recording of the images (data subject) has the right to access them (Article 11(1) of the LPD), unless the images are being used in the context of criminal investigation, in which case the The holder's request must be addressed to the CNPD (paragraph 2 of the same article). When making the images available to the data subject, the person responsible must adopt the necessary technical measures to hide the images from third parties that may have been covered by the recording. In order to guarantee the right to information enshrined in article 10 of the LPD, information notices must be posted in clearly visible places. The person in charge must adopt the security measures provided for in articles 14 and 15 of the LPD. Regardless of the security measures adopted by the entity responsible for the