

AUTHORIZATION No. 7048/ 2018

CENTRO VASCO DA GAMA - CENTRO COMERCIAL S.A, owner of a commercial surface, notified a processing of personal data resulting from video surveillance, with the purpose of protecting people and property, to be carried out at its establishment with the designation CENTRO VASCO DA GAMA and address Centro Vasco da Gama, located at Avenida D. João II n° 40 Lote 1.05.02, Parque das Nações, Lisbon 1990-094 Lisbon

The system consists of 250 cameras, placed in the following locations:

Circulation areas / Access to elevators / Warehouse / Car park / Vending machines / Car park / Sales areas / 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.

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The CNPD has already commented in its Deliberation No. for the purpose of protecting people 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 be collected from inside elevators, dining and drinking areas, access or interior of sanitary facilities, access or interior of changing rooms , review/approach rooms, break areas and other areas for workers.

The treatment under analysis, with the aforementioned limitations, is adequate, relevant and not excessive in view of the

stated purpose (cf. article 5, no. 1, subparagraph b) of Law 67/98, of 26 October, amended by Law

1 Available at www.cnpd.pt/bin/orientacoes/principiosvideo.htm

n.º103/2015, 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 privacy, provided for in article 7, no. 2, of the LPD. Article 8(2) 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 CENTRO VASCO DA GAMA - CENTRO COMERCIAL S.A

Purpose Protection of people and property

Category of personal data processed Images captured by the system.

By request In person / to the person in charge in the following

How to exercise the right of access address/contact: Centro Vasco da Gama, located at Avenida D. João II nº 40 Lote 1.05.02, Parque das Nações, Lisbon 1990094 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, no. 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.

Information notices of the existence of video surveillance must be posted in conspicuous places,
under the terms required by article 31, no. 5, of Law no. 34/2013, of 16 May.

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 treatment, it is responsible for ensuring the result of the effective security of the images.

The person responsible for the treatment must also always keep the date and time of the recordings up to date.

Lisbon, 24-05-2018

The president

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Filipa Calvão