

Process No. 9702/2018

AUTHORIZATION No. 7189/ 2018

Square Asset Management Sociedade Gestora de Fundos de Investimento Imobiliário S.A.,
commercial surface owner, notified a processing of personal data resulting from
video surveillance, with the purpose of protecting people and property, to be carried out in your establishment
with the designation CENTRO COMERCIAL CONTINENTE PORTIMÃO and address Centro
Commercial Modelo de Portimão, located in Quinta da Malata, Lot 1, parish of Portimão, municipality
de Portimão 8500-510 Portimão

The system consists of 83 cameras, placed in the following locations:

Circulation zones / Access to elevators / Warehouse / Car park / Machines
vending/Car park/Sales areas/ATM's area/Technical areas/

There is visualization of the images in real time.

There is no transmission of images outside the system installation site.

There is no Workers' Commission.

The CNPD has already commented in its Deliberation n.º 61/2004, of 19 April 1 on the principles
guidelines for correct compliance with the Data Protection Law, in terms of
video surveillance, as well as the general conditions applicable to the processing of personal data for the
purpose of protecting people and property. They derive 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
- ☐

encompass images of public roads or neighboring properties;

In the case of ATM payment terminals, the cameras cannot be
directed in order to capture the typing of codes;

- ☐ Cameras cannot regularly focus on workers during the activity

work, nor can the images be used to control the activity of

workers, whether to measure productivity or for accountability purposes

disciplinary (cf. articles 20 and 21 of the Labor Code);

☐ Only the collection of images in the declared locations is covered by this

authorization, and under no circumstances may images of the

interior of elevators, dining and drinking areas, access or interior of

sanitary facilities, access to or inside changing rooms, review/approach rooms,

rest areas and other areas for workers.

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

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

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

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, no. 2 and article 31 of Law no. 34/2013,

of May 16, constitute the foundation that legitimizes the installation of these systems.

Thus, with the limits set, the treatment notified under the provisions of

Articles 7, no. 2, 28, no. 1, point a), 29 and 30, no. 1, of the LPD, in the following terms:

Responsible

Square Asset Management Sociedad Gestora de Fondos de

Investimento Imobiliário S.A.

Goal

Protection of people and property

Personal data category

treaties

Images captured by the system.

Form of exercising the right to

access

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

address/contact: Centro Comercial Modelo de Portimão, located

in Quinta da Malata, Lot 1, parish of Portimão, municipality

de Portimão 8500-510 Portimão

Communication

of the images

Images may only be transmitted in accordance with criminal procedural law.

Once a possible criminal offense is detected, the person responsible must, together with the

participation, send to the judicial authority or to the criminal police body

the images collected.

In other situations where the authorities request access to the images, this only

may 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 conservation

30 days

Any person covered by the recording of the images (data subject) has the right to

access (article 11, no. 1, of the LPD), unless the images are being used within the scope of

criminal investigation, in which case 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 technical measures necessary 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 responsible 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 up to this to ensure 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.

Lisbon, 24-05-2018

The president

Filipa Calvão