

 <b>CORVINUS UNIVERSITY</b> of BUDAPEST	<b>PROVISIONS OF THE PRESIDENTIAL COMMITTEE</b>	<b>6/2024.</b> Version Number: <b>01.</b>
<b>ON CAMERA SURVEILLANCE</b>		

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**Purpose of the Provisions**

**1. §**

- (1) The purpose of the present Provisions is to define the goal of operating the camera surveillance system of the Corvinus University of Budapest (hereinafter: University), the principles of operation, in particular the moral rights of the data subjects, the basic rules of operation, the rights and obligations of the University and the data subjects, the related responsibilities and powers.

**Scope of the Provisions**

**2. §**

- (1) The territorial scope of the present Provisions covers all the real estate property owned, operated by the University or rented by the University. In the case of joint operation, the provisions shall apply to the property concerned as agreed between the contracting parties (hereinafter: University buildings).
- (2) The material scope of these provisions covers all camera surveillance systems installed in the University buildings.
- (3) The personal scope of these Provisions shall apply to:
- any person who enters the area monitored by the camera surveillance system (hereinafter referred to as "the data subject"), and
  - every natural person or legal entity engaged by the University under an employment or other contract for work who is involved in the operation of the camera surveillance system (hereinafter: "persons involved in the operation").
- (4) By entering the University premises, the data subject expressly consents to video recording being performed throughout the University premises as well as live footage monitoring being carried out. Such footage may feature any person in his/her capacity as data subject.

**Related documents, acts, decrees**

**3. §**

- (1) Related legislation and internal regulatory documents:
- Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR);
  - Act I of 2012 on the Labour Code;
  - Act CXII of 2011 on informational self-determination and the freedom of information;
  - Act CXXXIII of 2005 on Security Services and the Activities of Private Investigators;
  - Provisions of the Presidential Committee on the House Rules of the Corvinus University of Budapest.

**ON CAMERA SURVEILLANCE****Principles****4. §**

- (1) The University operates a camera surveillance system for reasons of personal and property security in the University buildings.
- (2) The camera surveillance system is capable of transmitting video footage (for the purposes of live monitoring) and/or recording footage.
- (3) During the operation of the camera surveillance system, footage containing personal data is recorded.
- (4) These provisions shall define the rules for operating the camera surveillance system with due consideration for legislation, including but not limited to Regulation (EU) 2016/679 (hereinafter: GDPR).
- (5) In applying these provisions, particular attention should be paid to the moral rights of data subjects.

**Powers and responsibilities****5. §**

- (1) The camera surveillance system is operated by Campus Services;
- (2) The lawful operation of the camera surveillance system shall be the responsibility of the Head of Campus Services;
- (3) In view of Subsections (1)-(2), the controller of personal data processed by the CCTV system is Campus Services, and the Head of Campus Services is responsible for ensuring compliance with the Provisions of the Presidential Committee on the Rules of Data Protection and other internal data protection rules.
- (4) Legal, Administrative and Regulatory Services (hereinafter: "LARS") shall be in charge of taking a stand on whether the right of access exercised by virtue of reviewing the camera recordings is in compliance with the GDPR.

**Goal of camera surveillance****6. §**

- (1) The University may apply camera surveillance exclusively according to the principles determined in 4. §, for purposes of the security of persons and properties. Surveillance of the data subjects for any other reason shall be prohibited.
- (2) The following shall be considered objectives to protect the security of persons and property:
  - a) Protecting the University's assets and supporting investigations into infringements committed against property.
  - b) Protecting the property of data subjects and supporting investigations into infringements committed against them.

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- c) Investigating the circumstances of an accident, on-the-job accident or damage occurring on the University's premises.
- d) Investigating the circumstances of acts that violate University regulations.
- e) Keeping the business secrets of the University.
- f) Protecting life and limb and personal freedom.

**Placement of the cameras**

**7. §**

- (1) The exact position and number of cameras installed in the University buildings, the areas they monitor and the important characteristics of the monitoring are set out in Annex 1 to these Provisions.
- (2) The monitor used for live surveillance and for viewing the recordings shall be positioned by the University in such a manner that it may not be seen by any unauthorised person.
- (3) The installation of any camera shall be subject to the permission of the Presidential Committee (after the amendment of Annex 1 hereof).
- (4) Before deploying cameras, it is necessary to check that the type of camera, the area to be monitored and other features comply with operational, legal and data protection requirements. Any investigation shall be carried out according to the procedure defined by the Head of Campus Services;
- (5) Contracting partners may install cameras in the University buildings in island mode exclusively, following consultation with the University and/or as provided in the relevant contract. In this case, all legal liability for data processing realised with the use of the camera shall be borne by the contracting partner.

**Operation and management of the camera surveillance system, reviewing the recordings**

**8. §**

- (1) The camera surveillance system is operated by the University on a closed-circuit system, 24 hours a day, 7 days a week.
- (2) The University also uses a contractor engaged in the protection of persons and property for performing the activity, for live surveillance, for providing software support for the monitoring system and for maintaining the system. The relevant confidentiality, data management and liability issues are regulated in a works contract and the related instructions. The need to conclude a data processing contract must be assessed in each case.
- (3) The following persons shall be authorised to view and to order the saving of the recordings made by the camera surveillance system:
  - a) Chancellor;
  - b) Head of Campus Services;

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- c) Head of Operations and Investment;
  - d) the security expert;
  - e) for dormitories, the head of the dormitory in question.
- (4) An employee of the company providing personal protection and property security or concierge service during a given period may monitor the live footage transmitted by the camera surveillance system and/or shall assist if a review is ordered or the recording is to be saved.
- (5) Recordings may be viewed exclusively for the purpose determined in 6. §.
- (6) Any data subject featured on the recording has right of access to the recording in the exercise of his or her rights of control under the GDPR. Access shall be granted with due regard to compliance with the provisions of Article 14 (3)-(4) of the GDPR, in respect of which the position of LARS shall be sought (releasing of copies or masking any person other than the data subject visible in the recording).
- (7) The recordings may be accessed by the initiator of the procedure, the person or body subject to the procedure, or the person or body conducting the procedure, for the purpose of asserting a claim or to the extent necessary, for the performing his/her/its duties in the context of an ethics review, disciplinary procedure or other investigation based on an internal regulatory document of the university, as specified in 6. §. Other persons involved in the procedure (e.g. experts, witnesses) may have access to the recordings for the purpose of performing their duties or for the purpose of providing evidence, as expressly decided by the person or body conducting the procedure. The recordings must be provided in judicial or other administrative proceedings in accordance with the relevant legislation.
- (8) The viewing shall be duly recorded in minutes in the format attached hereto in *Annex 2*. The copy of the report shall be recorded and the report retained by Campus Services until the lawful erasure of the given recording or, should either the University or the data subject enforce any legal right related to the recordings in question, for 5 years or until the limitation period has expired.

**Period of retention of the recordings****9. §**

- (1) The recorded image must be destroyed and/or deleted after 30 days from the date of recording, unless it has been used or will be used as evidence in an ethics review, disciplinary, other procedure under an internal regulatory document of the university, judicial or other administrative proceedings.
- (2) The data subject and/or the person whose right or lawful interest the recording may affect may request the University not to destroy and/or not to delete the recording by writing to the Head of Campus Services at the [kamera@uni-corvinus.hu](mailto:kamera@uni-corvinus.hu) e-mail address. In this case Campus Services shall make a copy of the recording in question and store it separately in addition to draw up a report referred to in 8. §(8).

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- (3) The request referred to in Subsection (2) shall be submitted with the Head of Campus Services, who shall make a decision on the request in 10 working days and give written notice to the applicant of such decision. The recording may not be destroyed, but shall be saved as long as the deliberation on the request has been made. In the event the request is declined, the reasons for declining shall be given. LARS and, in justified cases, the Data Protection Officer shall assist in the assessment of the request.
- (4) The data subject may be provided with the recordings made of him or her only, and the exercising of such right shall not infringe the personal rights of any other person who can be seen in the recording. In the case of recordings in which any other person(s) can also be seen, the data subject shall be granted the right to be informed in writing of the content of the recording and, if he or she so chooses, to view the recording in person, provided that the manual masking of such other person(s) during the viewing can be realised. Otherwise, the third parties in the recording should be masked by means of information technology in accordance with Point 94 of Guidelines 3/2019 of the European Data Protection Board on the processing of personal data through video devices. If the data subject requests a copy of the recording, LARS and, where appropriate, the Data Protection Officer shall be consulted before responding to such request.
- (5) In the event of an ethics review, disciplinary procedure, or other investigation based on an internal regulatory document of the university, a reasonable suspicion of a breach of rules or a criminal offence, where the University initiates proceedings or files a complaint by using the recording as evidence, the rules set out in (2) shall apply *mutatis mutandis*.

**Provisions on data processing****10. §**

- (1) The legal grounds for the use of the camera surveillance system is the legitimate interest of the University (Article 6(1) f) of the GDPR).
- (2) Prior to the acquisition or installation of a camera, the organisational unit operating the system as defined in 5. §(1) shall, with the approval of the Data Protection Officer, carry out a balancing of interests test, taking into account the principles of purposeful and fair processing and the requirement of proportionality, in order to substantiate the legitimate interest of the University.
- (3) The data processing notice pursuant to Articles 13 and 14 of the GDPR in the context of camera surveillance shall be prepared by LARS.
- (4) The Head of Campus Services shall ensure that the awareness sign (pictogram information) attached hereto in *Annex 3*, referring to the camera surveillance system and containing the data processing notice prepared by LARS in compliance with the GDPR in the form of a QR link, shall be posted in each building.

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**Miscellaneous and final provisions**


**11. §**

- (1) The present Provisions shall enter into force 5th March 2024.
- (2) At the same time, Provisions No 2/2023 of the Presidential Committee on Camera Surveillance shall be repealed.

**Annexes:**

1. Annex: Positions and parameters of cameras
2. Annex: Form for drawing up minutes of the viewing of recordings
3. Annex: Information on camera surveillance (pictogram)



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Annex 1

**Positions and parameters of cameras**

**The annex is included in a separate document (excel file).**

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Annex 2

**Form for drawing up the report of the viewing of recordings**

# Report

of the viewing of recordings performed in accordance with Provisions No. 6/2024 of the Presidential Committee on camera surveillance

The person who ordered the viewing	
- <b>name</b>	
- <b>job title</b>	» Please select an option «
<b>Purpose of protection of persons and property giving rise to viewing the recording</b>	<input type="checkbox"/> the protection of University property and infringements committed against it <input type="checkbox"/> the protection of data subjects' property and infringements committed against it <input type="checkbox"/> accident <input type="checkbox"/> on-the-job accident <input type="checkbox"/> damage <input type="checkbox"/> violation of university rules <input type="checkbox"/> trade secret protection <input type="checkbox"/> protection of human life <input type="checkbox"/> protection of life and limb <input type="checkbox"/> protection of personal freedom
<b>Person requesting the viewing</b> (if different from the person who ordered the viewing)	
- <b>name</b>	
- <b>status</b>	<input type="checkbox"/> employee <input type="checkbox"/> student <input type="checkbox"/> other data subjects
<b>The exact date of the viewing</b>	
- <b>date:</b>	To enter a date, click here.
- <b>hour</b>	
- <b>minute</b>	

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<b>Data of the recording viewed</b>	
<b>– Position of the recording camera</b>	
<b>– Starting time of the viewed recording</b>	
○ <b>date</b>	To enter a date, click here.
○ <b>hour</b>	
○ <b>minute</b>	
<b>– Finishing time of the viewed recording</b>	
○ <b>date</b>	To enter a date, click here.
○ <b>hour</b>	
○ <b>minute</b>	
<b>Names and job titles of the persons present during the review of the recording</b> (if the data subject is present, the job title should be replaced by “data subject”)	
<b>Name</b>	<b>Job title</b>

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**Description of findings**


**The recording shall be saved**

- Yes  
 No

Place and date: Budapest,

**Signatures of the persons attending the viewing**

Name	Signature

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Annex 3

**Information on camera surveillance (pictogram)**



*Place of QR code*

The camera system is operated by the Corvinus University of Budapest (registered seat: 1093 Budapest, Fővám tér 8; Tax No.: 19156972-2-44; hereinafter referred to as: Data Controller) Contact details of the Data Protection Officer of the Data Controller: e-mail: [adatvedelem@uni-corvinus.hu](mailto:adatvedelem@uni-corvinus.hu); phone number: +36-1-482-5000; mailing address: 1093 Budapest, Fővám tér 8.

The purpose of the processing: the University uses camera surveillance for personal and property security purposes, and not for the purpose of monitoring persons engaged by the University under a work-related legal relationship (hereinafter referred to as "employees").

The following shall be considered objectives to protect the security of persons and property: Protecting the University's assets and supporting investigations into infringements committed against property. Protecting the property of visitors (data subjects) and supporting investigations into infringements committed against them. Investigating the circumstances of an accident, on-the-job accident or damage occurring on the University's premises. Investigating the circumstances of acts that violate University regulations. Keeping the business secrets of the University; Protecting human life and limb and personal freedom. The camera system does not record sound, and the live and recorded images from the cameras are available round the clock.

Rights of Data Subjects: You have several rights, most importantly the right to information and the right of access. For further details, please refer to the Data Protection Notice, which can be accessed (through a QR code) on our website [www.uni-corvinus.hu](http://www.uni-corvinus.hu) or requested from our Data Protection Officer.