### Annex 33

# Data Processing Policy Management of data related to the operation of the CCTV system

# Data controller and operator of the CCTV system

The data controller is the University of Debrecen (UD)

Address: 4032 Debrecen, Egyetem tér 1.

Email: szolgaltatasi.igazgato@fin.unideb.hu

Data protection officer:
adatvedelmi.tisztviselo@unideb.hu

The CCTV system is operated by the UD Human Service Kft. (4032 Debrecen, Nagyerdei körút 98.) as data processor.

### Regulatory background of the CCTV system

The operation of the CCTV system is regulated by the Chancellor's Order and the General Data Protection Regulation (EU, 679/2016).

### Purpose of the operation of the CCTV system

UD operates the CCTV system for the following purposes:

- To protect the properties and facilities of UD
- To protect the properties of data subjects
- To clarify the circumstances of any accident or incident
- To clarify the circumstances of any offenses

### Scope of the personal information managed

The CCTV system captures the images and actions of persons entering the areas monitored.

### Legal base for making recordings with the CCTV system

The legal base for making recordings is the legitimate interest of UD [GDPR, Article 6 (1) f]]. The primary legitimate interest of UD is to clarify the circumstances of offences, accidents and incidents, to identify the offenders, and to initiate the relevant procedures.

# Place of storing the recordings, retention period

UD stores the recordings on servers located at its facilities. Recordings are stored for 10 days.

### Persons authorised to access the recordings

The replay of recordings can be ordered by the chancellor, the data protection officer of UD, the vice chancellor for service and technical affairs, and the head of operations. Only those specified in the Order are allowed to be present when recordings are replayed.

### Security measures

UD stores the recordings on its servers that are protected by passwords and not connected to the internet. All access to and operations with the recordings are logged.

# Rights of and legal remedies available for data subjects

Access right. Data subjects may request information about the recordings to the extent of their involvement, and about the data management policy of UD. Data subjects may view the recordings captured by the cameras and may request a copy. In this regard, they may obtain further information from the contacts indicated in this document.

Restriction right. Data subjects may request the retention of recordings, e.g. if they are willing to use the recordings as evidence in a legal procedure.

Right to object. Data subjects may object to data management.

If a data subject believes that data management is not in compliance with the relevant regulations, they may turn to the National Authority for Data Protection and Freedom of Information, or to the court.

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<sup>&</sup>lt;sup>3</sup> Effective April 1, 2021