Privacy Notice - CCTV at EY's office in Copenhagen

Introduction

This Privacy Notice applies to all visitors to EY Godkendt Revisionspartnerselskab and EY Net Source A/S (jointly defined as “EY”) office in Copenhagen, such as EY’s employees, partners, contractors, suppliers, clients, prospective clients and all other individuals visiting EY’s office in Copenhagen (collectively “Visitors”) about whom EY collects or holds personal data because of the operation of its CCTV system.

This Privacy Notice explains the kind of personal data EY collects in connection with operation of its CCTV system, how the personal data are processed, for what purpose and for how long time. This Privacy Notice also provides information about your rights as a data subject under applicable data protection legislation in relation to your personal data processed by EY.

Who is responsible for the processing of personal data?

EY Godkendt Revisionspartnerselskab (registration number 30700228) is the legal entity who is responsible for CCTV system (a video surveillance system) installed at EY's premises at Dirch Passers Allé 36, 2000, Frederiksberg, Denmark, and at EY’s premises at Dirch Passers Allé 27, floor 4, 2000, Frederiksberg, Denmark.

How we obtain your personal data?

The CCTV cameras monitor EY’s reception area, entries, car parking and rooms containing EY technical equipment (44 CCTV cameras in all) 24 hours a day and this data is continuously recorded.

43 CCTV cameras are installed at EY’s premises at Dirch Passers Allé 36, 2000. Frederiksberg, Denmark, and 1 CCTV camera are installed at EY’s premises at Dirch Passers Allé 27, floor 4, 2000, Frederiksberg, Denmark.

To be effective, CCTV cameras must be positioned in the right place, configured to capture usable and relevant video and be able to retain footage long enough to determine if there is any security purpose for the footage. Camera locations are chosen to minimise the capture of image. The cameras aim to give an overview of what is happening on EY’s premises. No public areas are part of the surveillance or captured by the cameras. The surveillance system is not used to record sound, only the images are recorded.

Types of personal data processed

Images of Visitors and their vehicles, including license plates.

Why do we process your personal data?

EY office houses both EY and client information (including personal data). This includes information that EY is under both contractual and legal responsibility to protect from disclosure. Protecting confidential information obtained from, or relating to, our clients or third parties, as well as personal information about our people, is one of EY’s key values embedded in EY’s Global Code of Conduct. Finally, EY has a duty of care to protect the life and health of EY people and visitors who are in an EY premise. CCTV provides a critical portion of the overall security controls protecting an EY premise.

Legal grounds for processing personal data through CCTV of Visitors to EY are:

- EY’s legitimate interest in protecting its office, goods and confidential information against unauthorised access, theft and other incidents (“security incidents”); and
- EY’s legitimate interest in preventing and detecting crime directed towards EY, its personnel or other Visitors to EY, and establishing, exercising and defending legal claims connected to such crimes.

The CCTV system is not used for any other purpose, such as to monitor who is visiting the EY office, or when employees arrive at or leave the office. The system is also not used as an investigatory tool or to obtain
evidence in internal investigations or disciplinary procedures unless any of the reasons stated in the paragraph above are at hand. In case of a security incident such as unauthorized access to EY’s office, CCTV recordings will be reviewed by authorized EY personnel to investigate the incident.

Cameras are only used if the security of EY’s premises, assets, people and visitors could not reasonably be fulfilled by other means which are less intrusive to the privacy of the individuals who are being recorded.

Who has access to your personal data?

Live feeds from cameras placed at non-visible entries are monitored by the Securitas guard on duty during 18:00 - 08:00 for weekdays and during the entire 24 hours for weekends and public holidays. Retained recordings can only be accessed by ISS Technical Manager and IT admin (JB·Networks ApS) during the retention period. All personnel having access are located at the Copenhagen office.

EY will ensure that the live feeds from cameras and recorded images are only viewed by authorised personnel whose role requires them to have access to such data, unless EY is legally required or assess that such images need to be provided to an authorised authority in connection with a security incident or otherwise. The recorded personal data cannot be accessed without the authorisation from Facility Manager after consultation with Legal. Legal will assess whether EY is under a legal obligation to hand over the data and if no such legal obligation exists, whether EY is otherwise allowed to share CCTV footage outside the EY organization.

Security

EY is committed to making sure your personal data is secure. To prevent unauthorized access or disclosure, EY has technical and organizational measures to safeguard and secure your personal data. All EY authorised personnel engaged to process your personal data are obliged to respect your data’s confidentiality.

How long do we keep your personal data?

CCTV recordings are as a main rule retained for 30 calendar days, unless a longer time period is reasonably required in the specific case (for example in case of a suspected crime reported to the police) after your visit to the EY office. After that period, any CCTV recorded footage is automatically deleted. The 30-calender day retention period is set in order to enable EY to respond to a request by an individual made under the data protection legislation, in order to be able to investigate a security incident that has occurred or otherwise to comply with a legal obligation to which EY may be subject.

Data subject rights

You have the right, at any time and free of charge, to obtain a confirmation from EY as to whether or not personal data concerning you is being processed by EY, and where that is the case, access to your personal data. In addition, you may have the right to request erasure or restriction of processing of your personal data.

You can make use of any of your rights as a data subject, by sending an e-mail to dponordics@se.ey.com.

Complaints

If you are concerned about an alleged breach of privacy law or any other regulation, you can contact EY Nordic Data Privacy Officer (DPO) via e-mail at dponordics@se.ey.com. DPO will investigate your complaint and provide information about how it will be handled and resolved.

If you are not satisfied with how EY has resolved your complaint, you have the right to complain to the data protection authority in Denmark (Datatilsynet). You can also refer the matter to a court of competent jurisdiction.

Contact us

If you have additional questions or any concerns, please contact your usual EY representative or send an e-mail to: dponordics@se.ey.com

Version: January 2020