



PRIVACY NOTICE

For the processing of Personal Data

by means of Video Surveillance System [CCTV]

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In accordance with the provisions of Regulation (EU) 2016/679 (hereinafter referred to as “General Data Protection Regulation” or “GDPR”), Law 4624/2019 and the applicable legislative and regulatory framework, the Ministry of Migration and Asylum makes this statement regarding the processing of your personal data in the context of operation within the centers of a closed video surveillance system [CCTV].

Processing controller	Ministry of Migration and Asylum (email: dpo@migration.gov.gr contact form: https://migration.gov.gr/epikoinonia/ , 196-198 Thevon Avenue, P.C. 182 33, Aghios Ioannis Rentis – Nikaia, Attica)
Data processors	Specialized companies that provide security, maintenance and technical support of the systems, the details of which you can obtain upon submitting a relevant request (Article 14 par.1 of Law 3907/2011). Data processors are bound by a written contract ensuring the confidentiality and security of the processing.
CCTV/Control points	In special entry/exit points and in special storage areas of critical files and critical infrastructure of the Ministry of Migration and Asylum, cameras have been installed to capture only real-time image data of persons entering the centers of the Ministry of Migration and Asylum. Before the visitor enters the area that is covered by the video surveillance system, there are visible signs to inform natural persons on the first level. The video surveillance system is in continuous operation, i.e. 24 hours a day, 7 days a week. It is mentioned that the Ministry of Migration and Asylum does not receive any image from areas where a person does not expect video surveillance, such as toilet areas, dormitories, dining areas, offices.
What type of data we collect	The personal data collected is image, audio and video data. The images are of any natural person who enters the range of the cameras.
Purpose of processing/legal basis of processing	The use of a video surveillance system by the Ministry of Migration and Asylum takes place for the purpose of protecting the property, the safety of persons and goods kept within the



	<p>centers of the Ministry of Migration and Asylum. The processing is carried out as set out in Article 6 par.1 point e of the GDPR in combination with Law 4624/2019 taking into account Directive 1/2011 of the HDPa and Guidelines 3/2019 of the EDPB.</p>
Lawfulness of processing	<p>The main or general legal basis for the processing of video surveillance data is the performance of a duty in the public interest in the exercise of public authority [Article 6 §1 point e of the GDPR] while the processing of specific categories of (biometric) data is carried out for reasons of substantial public interest (Article 9 par. 2 point g of the GDPR), based on the Dublin III Regulation or the Migration Code, while the CCACs constitute “critical infrastructure of the State”. In addition to the above, with a special sense of responsibility and respect for human beings, the above protection framework also includes the safety of life, physical integrity, health and property of the residents, of our staff, associates, and in general the visitors who enter the supervised area. The collection of the data is limited only to the capture of images and only in areas that we have assessed that there is an increased possibility of committing illegal acts and a need for the increased protection of people and goods, e.g. at entry points, without focusing on areas where the privacy of the persons whose images are taken, may be unduly restricted, including their right to respect for personal data.</p>
Data Retention	<p>The data is stored on a server of the Ministry of Migration and Asylum which is located in the Keranis Building (196 – 198 Thevon Avenue, P.C. 182 33, Aghios Ioannis Rentis – Nikaia, Attica). We retain data of the material for a period of up to 15 days, after which it is automatically, securely and irretrievably deleted. If an incident is detected during this period, the Ministry of Migration and Asylum shall isolate part of the video and retain it for a further period of up to 30 days, in order to investigate the incident and initiate legal proceedings to defend its legal interests, and if the incident involves a third party, the video shall be retained for a further period of up to 3 months. The material shall be further retained if deemed necessary on a case-</p>



	by-case basis to support or refute any legal claims.
Data security	<p>The Ministry of Migration and Asylum implements appropriate technical and organizational measures to ensure the security of personal data of natural persons that it processes in the context of its activities as the case may be, and in particular of data collected through the video surveillance system in its critical infrastructures. In particular: a. network security procedures and policies, storage in special computer rooms, encryption, access codes are applied, b. restricted access policies are applied to both the recording infrastructure and the recording information, c. a DPO has been appointed, d. secure data transmission procedures are applied in the event of a request. Storage takes place in a specially configured infrastructure with limited and controlled access. Moreover, the copies are granted with the other persons blurred, in order to minimize the data.</p>
Your rights	<p>You can find out about your personal data on the website of the Ministry of Migration and Asylum (http://migration.gov.gr) and from the special markings and information material available at the Center. You have the right to request further information by the DPO of the Ministry of Migration and Asylum (dpo@migration.gov.gr) about your rights in relation to the processing of your personal data and about risk assessments relating to such processing. You have the following rights on the material of the video surveillance system in accordance with Articles 12-22 of the GDPR, the provisions of Law 4624/2019 and under the relevant more specific conditions and restrictions, to the extent that they apply in relation to the use – processing of video surveillance data:</p> <ul style="list-style-type: none">- Right of access- Right of restriction- Right of deletion- Right to complain to the HDP <p>It is pointed out that the exercise of a right to object or delete does not entail the immediate deletion of data or modification of the processing.</p>
Procedure for exercising rights	The rights can be exercised as follows:



	<ul style="list-style-type: none">- by submitting a relevant electronic request to the DPO of the Ministry of Migration and Asylum at dpo@migration.gov.gr- by letter or delivery thereof to the Ministry of Migration and Asylum at the address: 196 – 198 Thevon Avenue, P.C. 182 33, Aghios Ioannis Rentis – Nikaia, Attica – for the attention of the DPO. <p>The service of the request shall require the applicant to:</p> <ul style="list-style-type: none">a) specify the period of time during which he/she was in the range of the cameras, providing an image of him/her, in order to facilitate the detection of the requested data and to hide the data of third parties depicted.b) to appear in person at the Ministry of Migration and Asylum after consultation so he/she can be shown the images in which he/she appears <p>The Ministry of Migration and Asylum shall make every effort to carry out the required actions within 30 days of the date of receipt of each request, unless the tasks related to its satisfaction are characterized by particularities and/or complexities on the basis of which it reserves the right to extend the time of completion of the actions. In any case, you will be informed by the DPO about the progress of the request within 30 days of its submission.</p>
Revision of this Notification	The Ministry of Migration and Asylum reserves the right to update this notification at any time.