

CVA TECHNOLOGY COMPANY LIMITED

CCTV - PRIVACY NOTICE

Privacy Notice effective from 24th May 2018

Updated on 16th November 2018

Version 1.1

This privacy notice tells you what to expect when CVA Company Ltd (Data Controller) collects personal information about you, in this case, static or moving imagery via CCTV or surveillance systems as you pass in front and through the CVA building. CVA is committed to protecting your personal information, safety and security when you use CVA services. We are legally obliged to use your information in line with all applicable laws concerning the protection of personal data, including the General Data Protection Regulation (GDPR).

What information will we collect about you?

When you pass by or through the CVA building we may collect static or moving imagery via CCTV or surveillance systems.

How will CVA use the information it collects about me?

CVA may use CCTV/surveillance imagery for several purposes including but not limited to the following:

- To maintain the safety and security of the CVA staff and stakeholders, including but not limited to Transport Malta
- For investigative purposes or as evidence to support any formal follow-up to CVA incidents
- In response to a subject access request

The lawful justification for collecting and using CCTV/surveillance imagery is that there are legitimate interests to do so. CCTV and surveillance imagery may be handled and used by the following recipients to maintain a safe, secure and efficient operation:

- CVA IT personnel
- Police/security services
- Other CVA service providers

We will keep your information within CVA and our trusted third parties except where disclosure is required by law, for example to government bodies, law enforcement agencies or in response to a subject access request.

How long will CVA keep my information?

By way of general guidance, the supervisory authority advises a 7- day retention timeframe in connection with CCTV recording. Since operational activities within CVA offices may be considered high risk due to monetary transactions within daily business operations and since statements to vehicle owners are issued on a monthly basis CCTV recording may need to be accessed from 30 days prior.

Therefore, under normal circumstances your information could be retained for up to 30 calendar days after which point it will be deleted. Imagery required for investigative or evidential purposes may be retained beyond 30 days and is securely disposed of upon completion/conclusion of the purpose for which it has been retained.

Imagery is retained in a secure environment and is only accessible by authorised personnel who have a legitimate reason to do so.

What rights do I have over my personal data?

Under the General Data Protection Regulation, you will have the right to, where appropriate:

- Access your personal data by making a subject access request
- Rectification, erasure or restriction of your information
- Object to the processing of your information

To exercise your rights please contact the CVA Data Protection Officer using the following contact details:

Data Protection Officer
CVA Technology Co Ltd.
83, Winemakers Wharf,
Marsa. MRS192. Malta
Tel: (+356) 2206 4000

Or email: GDPR@cvamalta.com

What if I find your response unsatisfactory?

Should you find our response unsatisfactory, you have the right to lodge a complaint with the supervisory authority – the office of the Information and Data Protection Commissionaire (IDPC).

You can find more information on the IDPC website
at <https://idpc.org.mt/en/Pages/Home.aspx> regarding the complaints process.

Changes to this privacy notice

We will keep this privacy notice under regular review and we will place any updates here. At the start of this privacy notice we will tell you when it was last updated.