



Vesteda Camera Surveillance Protocol

Introduction

Vesteda uses camera surveillance to secure the complexes it owns and to protect the residents and visitors of these complexes. This 'Vesteda Camera Surveillance Protocol' (hereinafter: the Protocol) explains, among other things, the exact purpose of camera surveillance, who is responsible for it, what rights those involved have, and how Vesteda takes into account the protection of the privacy of residents and visitors. If the complex is not wholly owned by Vesteda and there is a Homeowners' Association (Dutch: VvE), then camera surveillance is not Vesteda's responsibility but that of the homeowners' association. In that case, this Protocol does not apply. The camera surveillance policy is then determined by the homeowners' association. Do you live in a complex with a homeowners' association? If so, please contact the association if you have any questions or require additional information.

In this protocol, the following terms are understood to refer to:

Interested party	A person – other than a Data Subject – who has been the victim of an Incident and who, for that reason, has an interest in viewing the images that were recorded.
Data subject	A person who has been filmed, such as residents of and visitors to the complex.
Complex	A building owned by Vesteda where camera surveillance is in place.
Vesteda Management Board	Vesteda's statutory Management Board or the person(s) appointed by it and employed by Vesteda.
Incident(s)	Burglary, vandalism, theft, violent crime, other criminal offences, and/or (the suspicion of) the presence of uninvited guests.
Vesteda	Vesteda Investment Management B.V. and/or any company affiliated with Vesteda.
GDPR	General Data Protection Regulation.

Article 1. Purpose and basis for camera surveillance

1. The purpose of camera surveillance is to protect the Complex and its residents and visitors. More specifically, the purpose of camera surveillance is:
 - a. to prevent incidents in and around the Complex;
 - b. to prevent and limit damage (including vandalism) in and around the Complex;
 - c. to promote the safety of residents of and visitors to the Complex;
 - d. to secure access to the Complex;
 - e. to be able to report incidents to the police with supporting evidence, if this proves necessary.

2. The camera surveillance is based on Vesteda's legitimate interest, as set out in section 1 of this article and as referred to in Article 6(1)(f) of the GDPR. Vesteda has carefully weighed its legitimate interest against the privacy interests of residents and visitors and, based on (among other things) the following circumstances, Vesteda believes that in this case its legitimate interest outweighs the (potential) infringement of the privacy of residents and visitors:
 - a. the purpose of camera surveillance cannot be achieved in a less intrusive manner;
 - b. the cameras are placed in strategic locations, so that no more places, spaces or movements are filmed than is necessary to achieve the purpose;
 - c. the retention period of the camera images is strictly limited to what is necessary to achieve the purpose.

Article 2. Tasks and responsibilities

1. Camera surveillance is carried out under Vesteda's responsibility. All costs associated with camera surveillance are borne by Vesteda, which charges these costs on to the tenants of the apartments in the Complex via the service package.
2. Vesteda ensures that the recording systems are checked on a regular basis. Any malfunctions will be repaired immediately if possible.
3. Vesteda will ensure that the footage is handled with due care and confidentiality.
4. Vesteda will immediately secure footage when asked to do so by a third party (either the police, a resident, an employee or a visitor) in connection with an Incident.
5. The footage to be secured will be stored in a locked room under Vesteda's responsibility.
6. Vesteda may outsource the technical management and maintenance of the camera system to a third party. Vesteda will always reach clear written agreements with this third party regarding security and confidentiality.

Article 3. Use of camera surveillance

1. The cameras are installed in or near the Complex in such a way that it is possible to achieve the purpose of camera surveillance, while minimising any invasion of the privacy of residents and visitors.
2. Residents and visitors will be informed in advance in writing about the presence of camera surveillance.

Article 4. Privacy of residents and visitors

1. When installing cameras, Vesteda always carefully weighs Vesteda's legitimate interest in camera surveillance against the privacy rights and interests of residents and visitors.
2. Vesteda always installs cameras in such a way that no more places, spaces or movements are filmed than is necessary to achieve the purpose of camera surveillance.
3. Camera surveillance is only used in the parts of the Complex that are accessible to all residents and any visitors. Vesteda will never install cameras in areas intended solely for private use by residents, such as their homes or storage units.

Article 5. Access to recorded footage by an Interested Party

1. In view of privacy protection, the right to access the footage is subject to restrictions.
2. Interested parties may only request access to footage from Vesteda in the event of an Incident. Access will only be granted if an Interested Party can demonstrate that they have reported the Incident to the police.
3. When requesting access, an Interested Party must state the Incident and also the time and duration of the footage they wish to view.
4. Vesteda may, if necessary, charge on the costs of granting access to recorded footage.
5. Any footage can only be made available for inspection once Vesteda has weighed the interests involved, balancing the interest of the Interested Party in accessing the image material against the (privacy) rights and interests of the Data Subjects who can be seen in the footage.
6. Vesteda will make a decision on a request from an Interested Party to view the footage within a reasonable period of time.
7. Access to the footage will be provided at a location to be determined by Vesteda in the presence of Vesteda's Management Board. The Interested Party must provide valid proof of identity to establish their identity.
8. The Interested Party who is granted access to the footage must sign a declaration of access (Appendix 1), in which they declare that they will use the information from the footage confidentially and ethically.

Article 6. Access by Data Subject

1. Pursuant to Article 15 of the GDPR, every Data Subject has the right to access the personal data relating to them that is being processed. This means that a Data Subject may request access to the images made of them.
2. A Data Subject's right of access only extends to footage in which the Data Subject themselves can be seen. If other persons can also be seen in that footage, Vesteda will weigh up the Data Subject's interest in accessing the material against the interests of the other persons appearing in the footage.

3. Vesteda will inform the Data Subject within one month of receiving the request for access whether it plans to comply with the request. Depending on the complexity of the request, this period may be extended by a further two months.
4. If Vesteda rejects the request for access, it will state why it is rejecting the request.

Article 7. Providing third parties with visual material

Vesteda will only provide footage to a third party, other than an Interested Party or a Data Subject, on the basis of a demand or request from the police, judicial authorities or other competent government agency, with reference to the legal regulation underlying the demand or request.

Article 8. The camera system and security

1. In principle, the recorded footage cannot be viewed by Vesteda employees. However, this will happen if there has been an Incident with a direct impact on Vesteda itself.
2. The camera footage will be stored for a maximum of four (4) weeks (with the exception of the cases described below). If no Incidents have occurred or been reported to Vesteda during that period, the footage will be deleted.
3. Footage of an Incident will be stored for as long as necessary to deal with the Incident and will be deleted four (4) weeks after the Incident has been dealt with.
4. Camera footage used in the context of an investigation that has been reported to the police will only be destroyed after consultation with the police. The statutory period of four weeks does not apply in this case.
5. Incidents that require the storage of images are recorded and documented in a logbook, the Incident Log. If footage of an Incident is viewed, this is also recorded in a logbook. Vesteda manages the logbook.
6. Vesteda has taken technical and organisational measures to protect the footage against unauthorised access, loss or destruction, including encryption, strict access control and access registration. Vesteda evaluates these measures on a regular basis.

Article 9. Provision of information

1. Information stickers or a warning sign indicate that camera surveillance is in operation. These information stickers or warning signs are clearly visible in and around the Complex.
2. The cameras are always located in a visible place. There is no covert camera surveillance.
3. Vesteda makes this protocol available to anyone who requests it. The protocol can be requested from Vesteda in writing or digitally.



Article 10. Rights

Data subjects have certain rights under the GDPR, such as access, objection to and restriction of processing in the context of camera surveillance. A data subject can submit a request based on their rights under the GDPR by sending an email to privacy@vesteda.com.

Article 11. Questions, complaints, requests

If you have any questions or complaints regarding camera surveillance, you can submit them to Vesteda by sending an email to privacy@vesteda.com. If it does not prove possible to arrive at a solution through mutual consultation, you have the right to submit your complaint to the Dutch Data Protection Authority (Autoriteit Persoonsgegevens), or to initiate legal proceedings.



Appendix 1

Declaration of access to camera surveillance recordings (attached to camera surveillance protocol)

The undersigned:

Name:
Address:
Postcode/Town:
Date of birth:
Identification number:

Declares:

- (date) to have viewed the footage recorded in/of the
This is the footage dated (date),
.....(time);
- that they will use the information obtained from viewing the images confidentially and ethically, respecting the privacy of any third parties who can be seen in the footage.

Reason for access:

.....
.....
.....

For approval of the data subject:

Name:.....
Signature:.....

For Vesteda's approval:

Name:.....
Position:.....
Signature:.....

NB: This access declaration is kept in the Incident Log and serves to record the time of access and the reason for access.