



CCTV Privacy Notice

Eurospin Malta Limited

Introduction

Eurospin Malta Limited operates a video surveillance system on its premises to ensure the safety and security of employees, visitors, customers, and property. This CCTV Privacy Notice explains how we collect, use, and protect your personal data captured by our surveillance cameras in accordance with the EU General Data Protection Regulation (GDPR) and the Maltese Data Protection Act (Chapter 586 of the Laws of Malta).

By entering our premises, you acknowledge that you may be recorded by our CCTV system.

Data Controller Details:

Data Controller: Eurospin Malta Limited (Company Reg. No. C 102792)

Registered Address: Suite 1, Icon Business Centre, Zone 1, Central Business District, Mdina Road, Birkirkara CBD1010

Contact: info@eurospin.mt

Data Protection Officer: dpo.malta@eurospin.it

Purpose of CCTV Surveillance

We operate CCTV surveillance for the following legitimate purposes:

- **Safety and Security:** To protect the safety of our employees, customers, and visitors
- **Crime Prevention:** To prevent and detect crime, including theft, vandalism, and unauthorised access
- **Access Control:** To monitor entry to and exit from our premises
- **Incident Investigation:** To investigate incidents, accidents, or complaints that occur on our premises
- **Health and Safety:** To ensure compliance with workplace health and safety requirements
- **Asset Protection:** To protect our property and equipment from damage or theft

CCTV is **NOT** used for:

EUROSPIN MALTA LTD

Registration Number: C 102792 • Vat Number: MT29431508

Suite 1, Icon Business Centre, Zone 1, Central Business District, Mdina Road, Birkirkara CBD1010

Tel: +356 21 444962 • e-mail: malta@eurospin.mt

www.eurospin.com



- Routine employee performance monitoring
- Recording private conversations
- Monitoring in private areas (restrooms, changing rooms)

Areas Under Surveillance

CCTV cameras are strategically placed in the following areas:

- Building entrances and exits
- Garages and parking areas
- Common work areas and aisles
- Loading bay, storage and warehouse areas
- External perimeter of the building

Cameras are NOT installed in:

- Changing rooms, restrooms or toilet facilities
- Private offices (unless specifically required for security)
- Break rooms or staff rest areas

Clear signage is displayed at all entry points to inform you of CCTV operation.

Types of Personal Data Collected

Our CCTV system captures:

- Visual images of individuals on our premises
- Date and time stamps of recordings
- Movement patterns and behaviours in monitored areas

Our CCTV system DOES NOT capture:

- Audio recording – the system **does not** record audio conversations
- Detailed biometrics analysis - **no facial recognition** or detailed personal identification
- Vehicle registration numbers in parking areas are **not** captured

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Legal Basis for Processing

We process CCTV footage under the following GDPR legal bases:

- **Legitimate Interests** (Article 6(1)(f)): Our legitimate interest in ensuring the safety and security of our premises, employees, and visitors, and preventing crime
- **Legal Obligation** (Article 6(1)(c)): To comply with health and safety legislation and other regulatory requirements
- **Vital Interests** (Article 6(1)(d)): To protect the vital interests of individuals in emergency situations

We have conducted a Legitimate Interest Assessment to ensure our interests do not override the rights and freedoms of data subjects. "The benefits of enhanced security and crime prevention outweigh the minimal intrusion on privacy, provided controls remain in place to protect individuals' rights."

Data Retention Period

Standard Retention: CCTV footage is automatically deleted after **72 hours** under normal circumstances.

Extended Retention: Footage may be retained longer only in the following circumstances:

- When required for ongoing investigation of an incident
- When requested by law enforcement agencies
- When needed for legal proceedings
- When required by insurance companies for claims processing

In such cases, footage will be retained only for as long as necessary and will be securely deleted once the purpose is fulfilled.

Access to CCTV Footage

Access to CCTV footage is strictly controlled and limited to:

- **Authorised Personnel:** Only designated security staff and management

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- **Law Enforcement:** When legally required or requested
- **Regulatory Bodies:** When required by law or regulation
- **Legal Proceedings:** When necessary for court proceedings
- **Insurance Purposes:** For legitimate insurance claims

All access is logged and monitored.

Data Security

We implement robust security measures to protect CCTV footage:

- **Physical Security:** CCTV equipment is housed in secure, locked areas
- **Access Controls:** Password protection and user authentication systems
- **Encryption:** Digital footage is encrypted both in transit and at rest
- **Audit Trails:** All access to footage is logged and monitored
- **Staff Training:** Personnel handling CCTV data receive appropriate training
- **Regular Reviews:** Security measures are regularly assessed and updated

Data Sharing and Disclosure

We may share CCTV footage with:

- **Malta Police:** When required by law or for crime investigation
- **Regulatory Authorities:** When legally obligated to do so
- **Courts and Tribunals:** When required for legal proceedings
- **Insurance Companies:** For legitimate insurance claims
- **Emergency Services:** In emergency situations to protect vital interests

We do **NOT**:

- Share footage for commercial purposes
- Sell footage to third parties
- Use footage for marketing purposes
- Share footage without proper legal basis

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Your Rights Under GDPR

As a data subject, you have the following rights regarding CCTV footage:

Right of Access (Article 15)

- Request to see CCTV footage that clearly shows you
- We may need to blur or obscure other individuals to protect their privacy
- Proof of identity will be required

Right to Rectification (Article 16)

- Request correction of inaccurate data (though this rarely applies to CCTV footage)

Right to Erasure (Article 17)

- Request deletion of footage in certain circumstances
- This right may be limited if we have legitimate grounds to retain the footage

Right to Restrict Processing (Article 18)

- Request limitation of processing in certain circumstances

Right to Object (Article 21)

- Object to processing based on legitimate interests
- We will assess whether our legitimate interests override your rights

Right to Data Portability (Article 20)

- Generally not applicable to CCTV footage

Right to Lodge a Complaint

- File a complaint with the Information and Data Protection Commissioner (IDPC)

How to Exercise Your Rights

To exercise any of your rights regarding CCTV footage:

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1. **Contact us in writing** at: dpo.malta@eurospin.it
2. **Provide the following information:**
 - Your full name and contact details
 - Specific date, time, and location where you were recorded
 - Description of the footage you're seeking
 - Proof of your identity (copy of ID card or passport)
3. **Response Time:** We will respond within **one month** of receiving your request
4. **Verification:** We may need additional information to locate and verify the footage

Contact Information

For questions, concerns, or to exercise your rights regarding CCTV surveillance:

Data Protection Officer

Email: dpo.malta@eurospin.it

Company: Eurospin Malta Limited (Company Reg. No. C 102792)

Address: Suite 1, Icon Business Centre, Zone 1, Central Business District, Mdina Road, Birkirkara CBD1010

Complaints and Concerns

If you are not satisfied with how we handle your CCTV-related concerns, you can:

1. **First Contact Us:** dpo.malta@eurospin.it
2. **Contact the IDPC:**
 - Website: <https://idpc.org.mt>
 - Email: idpc.info@idpc.org.mt
 - Phone: (+356) 2328 7100
 - Address: Level 2, Airways House, Dun Karm Street, Birkirkara BKR 9037, Malta

Updates to This Notice

We may update this CCTV Privacy Notice from time to time to reflect:

- Changes in technology
- Legal or regulatory requirements
- Changes to our surveillance practices

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Updated notices will be posted at entry points and on our internal systems.

Current Version: Aug. 2025

Next Review Date: Aug. 2026

Additional Information

Automated Decision-Making

We do not use CCTV footage for automated decision-making or profiling.

International Transfers

CCTV footage is stored locally and is not transferred outside the European Economic Area without appropriate safeguards.

Data Protection Impact Assessment

We have conducted a Data Protection Impact Assessment (DPIA) for our CCTV system to ensure compliance with GDPR requirements.

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