

INFORMATION NOTICE ON VIDEO SURVEILLANCE

1 INTRODUCTION

Data protection is of the utmost importance Andbank Luxembourg (the “Bank”).

The purpose of this information notice is to provide information on video surveillance and the manner the personal data of the persons entering the building is protected in that respect.

2 DATA CONTROLLER

According to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation and hereinafter referred to as the “GDPR”), the controller of the video surveillance system is *Andbank Luxembourg* (the “Bank”).

3 LAWFULNESS AND PURPOSE

Video surveillance-related processing is necessary for the purposes of the legitimate interests pursued by the Bank. The legal basis is art. 6, (1) GDPR:

- Art. 6 1 (a) the data subject has consented to the processing of his or her personal data for one or more specific purposes;
- Art. 6 1 c) processing is necessary for compliance with a legal obligation to which the controller is subject. The employer is responsible for ensuring the safety of the employees at work (art.312-1 labor code);
- Art. 6 1 f) the processing is necessary for the purposes of the legitimate interests pursued by the controller, in this case the protection of goods.

The video surveillance system is not for viewing or monitoring the employees' work.

4 TRANSPARENCY

Any data controller is obliged to inform the persons concerned of the processing of personal data that it implements. This information must meet the requirements of Articles 12 and 13 GDPR.

4.1 Information to all employees

A first level in the form of a panel in the premises under video surveillance to inform employees and any other visitors. The present notice is available on the website and for the employees in the dedicated employees documents folder.

4.2 Information for staff representatives

Video surveillance was the subject of joint decision between the employer and the staff delegation, dated 12 September 2022, insofar as it is notably implemented for the safety and health needs of employees.

4.3 Individual information

In this case, individual information is provided:

- by affixing display panels and pictograms in areas subject to video surveillance; and
- in this more detailed information notice.

5 GDPR PRINCIPLES

The Bank will process the data subject's personal data in compliance with the GDPR principles as laid down in chapter two of the regulation, namely:

- lawfulness, fairness and transparency;
- purpose limitation;
- data minimization;
- accuracy;
- storage limitation;
- integrity and confidentiality.

6 DATA SUBJECTS' RIGHTS

Data subjects, notably visitors and employees, may contact the Data Protection Officer (the "DPO") regarding the following rights under GDPR:

- right of access to personal data and information,
- right of rectification,
- right to erasure ("right to be forgotten"),
- right to restriction of the processing of personal data,
- right to data portability,
- right to object, and the
- right to lodge a complaint with a data protection authority (in Luxembourg: the National Data Protection Commission, CNPD).

7 TECHNICAL AND ORGANIZATIONAL MEASURES

Pursuant to Article 32 of the GDPR, the Bank has put in place adequate technical and organizational measures to guarantee the security and confidentiality of the data being processed.

8 DATA RETENTION

The employer must define the retention period for the recordings. This duration must be proportionate to the objective pursued by the cameras. The Bank has defined this duration to one month, in other words, the recorded images are deleted one month after their recording.

9 CONTACTS

For any questions in relation to the processing of the data subject's personal data or the exercise of its rights, please may contact the Data Protection Officer ("DPO") via the postal address, by phone + 352 27 49 76 1 or by email at dpo@andbank.lu.

The data subject also has the right to make a complaint at any time to the National Commission for Data Protection (Commission Nationale de Protection des Données "CNPD") <https://cnpd.public.lu/en/support/contact.html>.
