
LMDDC – VIDEO SURVEILLANCE

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1. PURPOSE AND LEGAL BASIS

The LMDDC has implemented a SCS (Security Camera System) for its premises. The staff in charge of security at the LMDDC are responsible for the overall management and operation of the SCS, including activities relating to installation, recording, reviewing and monitoring.

The aims of the SCS are as follows:

- To prevent, reduce, detect and investigate incidents (thefts, fires, bomb alerts, accidents, etc.);
- To ensure the safety of staff and visitors;
- To assist in the investigation of suspected breaches of the LMDDC regulations by staff.

The use of SCS is justified by the following legislation:

- Article 6.1 (f) of the GDPR as that is the legitimate interest of the LMDDC and the LMDDC staff and third parties to ensure and grant the safety in the LMDDC's premises;
- Article L.261-1 (3) of the Luxembourg Labour Code ("Traitement à des fins de surveillance"). Data processing is carried out in the interests of employee health and safety.

The SCS is not intended to monitor staff movements, production processes, departments or working hours inside the workplace.

2. WHO IS MONITORED ?

- LMDDC staff (including temporary staff)
- Third parties: suppliers, visitors or service providers

3. WHAT IS MONITORED ?

- Main entrances of buildings
- Emergency exits
- Critical areas

4. ACCESS TO SCS FOOTAGE

SCS footage can only be accessed by the following people:

LMDDC

- Staff in charge of security at the LMDDC (live footage and recordings)

Third parties:

- External companies for maintenance purposes only (live footage and recordings)

If the images are required as evidence or for an investigation, the following parties may have access to the recorded footage:

- Management
- Staff in charge of security at the LMDDC
- The police
- The emergency services
- Public authorities (on request)

5. RETENTION OF IMAGES

Unless required as evidence, to investigate a crime or by law, SCS images will be kept for no longer than 15 days from the date of recording. Images will be automatically overwritten after this point.