

/Translation from the Lithuanian language/

APPROVED by
Order No 1 – 2
of Director of Vilniaus kooperacijos kolegija /
University of Applied Sciences
of 19 May 2022

**DESCRIPTION OF PROCEDURE FOR VIDEO SURVEILLANCE AND VIDEO DATA
PROCESSING OF VILNIAUS KOOPERACIJOS KOLEGIJA / UNIVERSITY OF
APPLIED SCIENCES**

**SECTION I
GENERAL PROVISIONS**

1. The Description of Procedure for Video Surveillance and Video Data Processing (hereinafter referred to as the Description) at Vilniaus kooperacijos kolegija / University of Applied Sciences (hereinafter referred to as VKK) shall establish the procedure of recording of the images of internal premises of VKK dormitory, storage and use of such video data.

2. This Description is prepared in accordance with the General Data Protection Regulation (hereinafter referred to as GDPR), the Republic of Lithuania Law on Legal Protection of Personal Data (hereinafter referred to as LLPPD) and other legal acts of the Republic of Lithuania regulating the secure control of personal data and the legitimacy of such data processing, as well as the Description of Procedure of Privacy Policy and its Implementation Measures at VKK.

3. The following definitions shall be used in this Description:

Employee responsible for maintenance of video surveillance system shall mean an employee appointed by the Director of VKK which is responsible for video recording equipment and video data control.

Data subject shall mean a natural person, the resident of VKK dormitory the data of which is processed by the data controller.

Data processor shall mean an employee appointed by the Director of VKK which is responsible for video data control.

Data controller shall mean Vilniaus kooperacijos kolegija, UAB, legal entity code 211965470, legal address – Konstitucijos pr. 11, Vilnius.

Video record shall mean an image recorded by video surveillance cameras equipped at VKK.

Video recording equipment shall mean digital equipment intended for recording, reviewing and copying of video data.

Video surveillance shall mean processing of video data related to a natural person (hereinafter referred to as the video data) using video surveillance tools (video cameras) despite the fact if such data are saved on the medium.

Video surveillance system shall mean video data recording equipment and video surveillance cameras.

SECTION II

OBJECTIVE AND SCOPE OF VIDEO SURVEILLANCE

4. The objective of video surveillance is to ensure the public order, the safety of VKK property, the rights and freedoms of VKK employees, clients, guests and other persons.

5. The video surveillance shall be performed in the premises of common use at the VKK dormitory located at Lvovo g. 38a, Vilnius.

6. The video data shall be recorded with the following video surveillance cameras:

Floor	Location	Number of cameras
I	Entry to the premises (inside)	2
II	Hallway	2
III	Hallway	2
	Kitchen	1
IV	Hallway	2
	Kitchen	1
V	Hallway	2
	Kitchen	1

7. The video surveillance shall be performed continuously.

8. The video surveillance shall be performed only in such part of premises and the video data shall be collected only in such amount as it is necessary for achievement of the objective of video surveillance.

9. The video surveillance shall be prohibited in such premises wherein the data subject reasonably expects absolute privacy and wherein such surveillance may degrade human dignity.

10. In order to inform data subjects about performance of video surveillance, the notices informing about video surveillance shall be posted in a prominent place.

11. When performing video surveillance in workplaces where employees work, they are informed about the processing of video data by signing.

SECTION III
PROCEDURE FOR MAINTENANCE OF VIDEO RECORDING EQUIPMENT AND
VIDEO RECORDS

12. The video records shall be processed following the main principles of video data processing and the requirements of confidentiality and safety.

13. All video data shall be controlled only by the employee appointed by the Director of VKK which is responsible for maintenance of video surveillance system and video data control (hereinafter referred to as the employee responsible for maintenance of video surveillance system), except for the cases when the technical breakdown occurs in the system or there is performed preventative maintenance.

14. Technologies of facial recognition and/or analysis shall not be used with the video surveillance systems.

15. The video data shall be stored in video data recording equipment no longer than 7 days.

16. After expiry of the term of storage of video data, the video data shall be recorded automatically on top, thus deleting the oldest data.

17. Backup copies of video data shall not be made unless there is a reasonable necessity to store the record of video data for longer period than the term set in Clause 14 of this Description for potential use of recorded data as the proof or information source in pre-trial investigation, civil, administrative or criminal case, other legal proceedings in order to defend VKK, the legitimate rights and freedoms of data subjects or third persons.

18. The Director of VKK, the employee responsible for maintenance of video surveillance system and data processors shall have access to the premises where the video surveillance control system is stored.

19. Under necessity the settings of video recording equipment may be modified.

SECTION IV
PROVISION OF VIDEO DATA AND DATA RECIPIENTS

20. The video data may be provided without the consent of persons whose image was recorded only to law enforcement or other state institutions, the provision of such data to which is mandatory according to the requirements of legal acts.

21. The video data may be provided to the data subject which has the legal ground for receipt of video data. The request submitted must contain the objective of use of video data (the legal ground) and the scope of requested video data.

22. By decision of data controller, the video data may be provided, without the consent of persons whose image was recorded, to pre-trial investigation institution, the prosecutor or the court as the proof in administrative, civil and criminal cases being in their discretion or in other cases established by law.

SECTION V

LIABILITY OF EMPLOYEE RESPONSIBLE FOR MAINTENANCE OF VIDEO SURVEILLANCE SYSTEM (DATA PROCESSOR)

23. The employee responsible for maintenance of video surveillance system shall be responsible for clearly and properly displayed information about video surveillance.

24. The employee responsible for maintenance of video surveillance system must:

24.1. follow the main principles of video data processing and the requirements of confidentiality and safety set in the Republic of Lithuania Law on Legal Protection of Personal Data, these provisions and other legal acts;

24.2. ensure that the area observed does not involve other spaces than it is defined in Clause 6 of this Description;

24.3. ensure that the video surveillance system is in good working order and that technical failures of this system are eliminated expeditiously, using all available technical resources;

24.4. ensure that unauthorized persons have no access to the video data processed;

24.5. take measures in order to prevent incidental or illegal destruction modification, disclosure and any illegal processing of video data and to protect the data which is stored in video data recording equipment;

24.6. not disclose, transfer to or allow the persons who are not entitled for this in any ways to familiarize themselves with the video data;

24.7. immediately notify the Director of VKK about any suspicious situation which may endanger the safety of video data processed.

25. The employee responsible for maintenance of video surveillance system shall be introduced with the legal acts regulating the legal protection of personal data upon signed acknowledgement and shall obligate to comply with them.

26. After expiry of employment relations, the employee deprives of the right to process personal data.

SECTION VI
FINAL PROVISIONS

27. The description of the video surveillance and video data processing procedure is published on the VKK website www.vkk.lt

28. The data subjects shall be introduced with the Description of Procedure for Video Surveillance and Video Data Processing upon signed acknowledgement at the moment of signing the agreement regarding accommodation in the dormitory.

29. The Description of Procedure for Video Surveillance and Video Data Processing shall be renewed with new amendment of Description, under necessity, after evaluation of the practice of applying this description.

30. In case of amendment of provisions of legal acts, the amended provisions shall be applied immediately before the amendment of this Description.
