



## INFORMATION NOTICE ON VIDEO SURVEILLANCE

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### INTRODUCTION

The aim of this document is to provide information about the video surveillance processing that Banque Havilland S.A. (the "Bank") has implemented with regard on the Bank's premises located at 35a, avenue J.F. Kennedy, Luxembourg L-1855.

This information is provided pursuant to the General Data Protection Regulation<sup>1</sup> (the "GDPR") which aims at increasing the protection of natural persons in relation to the processing of their personal data.

### 1. CONTROLLER

Contact details of the Controller:

**Banque Havilland S.A.**  
**35a, avenue J.F. Kennedy, Luxembourg L-1855**

### 2. PURPOSES AND LEGAL BASIS OF THE VIDEO SURVEILLANCE

The recording of images via video surveillance cameras is necessary in order to:

- secure the access to Bank's offices;
- ensure the safety of the Bank's staff, clients, prospects, visitors and staff of service providers and suppliers;
- detect and identify potentially suspicious or dangerous behaviours that may cause accidents or incidents;
- pinpoint the origin of an incident;
- protect the Bank's assets (facilities, equipment, cash etc.).

The Bank collects and further processes video surveillance images for the purposes of its legitimate interests in accordance with article 6 (1) point (f) of the GDPR.

### 3. CATEGORIES OF PERSONAL DATA PROCESSED AND SOURCE

#### Categories of personal data:

- Video surveillance images of the persons present on the Bank's premises;
- Date and time of such presence;

#### Source:

- Video recordings from cameras installed to secure specific areas, including but not limited to, the doors located on the relevant floors that provide access to the Bank's offices, a specific room where the Bank's servers are located and a few parking slots reserved for visitors.

### 4. RETENTION PERIOD AND TRANSFER TO THIRD PARTIES

The Bank decided to keep the images for a maximum period of 7 days.

Nevertheless, the Bank may keep the images of the video surveillance for more than 7 days in case of incident or offence. In such scenarios, the images may be forwarded to the police, to competent authorities, insurers or may be used in court or arbitration proceedings.

Except for the specific scenarios mentioned above (if existing), the video recordings will not be transferred to any third parties.

### 5. YOUR RIGHTS

As data subject, you have the following rights in accordance with the GDPR:

- right of access to personal data and information,
- right to rectification,
- right to erasure ("right to be forgotten"),
- right to restriction of 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 Commission nationale de protection des données, CNPD).

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<sup>1</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement as such data, and repealing Directive 95/46/EC.

Nevertheless, the Bank will check beforehand that the relevant conditions, if any, for the exercise of the rights indicated above are fulfilled.

To exercise all relevant rights, queries or complaints please contact the Bank's Data Protection Officer:

Email: [LUdataprotection@banquehavilland.com](mailto:LUdataprotection@banquehavilland.com), or

Telephone: (+352) 46.31.31.333 (recorded line / voice box), or by post:

**Banque Havilland S.A.**  
**Attn.: Data Protection Officer**  
**35a, avenue J.F. Kennedy**  
**L-1855 Luxembourg**

You will be provided with information on action taken by the Bank within one month of receipt of the request (and proof of your identity) by the Bank. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. In such cases, you will be informed.

This information notice may be subject to change. The latest version in force is available on the Bank's website (<https://www.banquehavilland.com>).