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# INFORMATION NOTICE ON VIDEOSURVEILLANCE

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**Societe Generale Luxembourg**  
Information notice on videosurveillance 2022

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## 1. About the information notice

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The aim of this information notice is to inform you in a transparent manner about the video surveillance processing which we are likely to implement with regard to the visitors and people present on our premises (whether they be our customers, prospects, agents or legal representatives of a client, as well as Société Générale Luxembourg staff and its affiliates or representatives, as well as external service providers and their staff).

## 2. Controller

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Your personal data is processed by Société Générale Luxembourg (hereinafter referred to as the « Bank »).

Société Générale Luxembourg's registered office is at the following address: 11, Avenue Emile Reuter, L-2420 Luxembourg. Tél.: (+352) 47 93 11 1 Fax.: (+352) 22 88 59.

## 3. Purposes and legal basis of the operations

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The bank collects and processes video surveillance data for the safeguarding of its legitimate interests, including the security of those present on its premises and the property of the Bank, according to article 6, §1, f) of the European regulation 2016/679 ("GDPR"). In particular, this processing is necessary in order to:

- Secure access to the Bank's premises;
- Ensure the safety of the bank staff, clients and visitors;
- Detect and identify potentially suspicious or dangerous behaviors which may cause accidents or incidents;
- Pinpoint the origin of an incident;
- Protect the assets of the bank (buildings, facilities, equipment, merchants, cash, etc...);
- Organize and supervise the rapid evacuation of people in the event of an incident; and;
- be able to alert the emergency services of law enforcement authorities in good time and to facilitate their intervention;
- the defense, exercise, or demonstration in court of the rights and interests of the Bank.

The Bank is also required to implement video surveillance of certain areas intended for interactions with cash or value carriers, in accordance with Article 29 of the law of 12 November 2002 relating to guarding and surveillance activities. In this case, the data processing is justified on the basis of Article 6, §1, c) GDPR.

In case the Bank's video surveillance should come to be qualified as surveillance in the workplace of the Bank's staff, such surveillance will be in accordance with Article L. 261.1 of the Labor Code. In addition to the aforementioned legitimate interests, this surveillance is sometimes necessary for the safety and health needs of the personnel filmed, in particular with regard to employees assigned to tasks presenting an increased risk (counter and cash handling; safes; etc.). In this case, the data processing is justified on the basis of Article 6, §1, point d) GDPR.

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## 4. Categories of personal data processed and source

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The data processed comes from:

- recordings of images from surveillance cameras installed at the counters -, public reception areas, car parks, safes, entrances and exits to public areas and secure areas, transport conveyor path areas funds, technical rooms, delivery and unloading docks;
- date and time of recordings.

## 5. Categories of recipients of processed data

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As a banking institution, we are bound by professional secrecy and may share your data only under strict conditions or with your consent.

The Bank may share your data with its subcontractors and service providers in accordance with the law and for the sole purpose of the services entrusted to them.

The Bank is also obliged to share your data when the professional secrecy is lifted by law and in particular with regard to the competent police or judicial authorities acting in the context of criminal proceedings, or any other proceeding, should the Bank need to defend its interests in justice.

In this case, this means that the Courts, the parties to the dispute and their lawyers may be recipients of this data.

## 6. Retention period

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The video recordings are kept for a maximum period of eight (8) days, except in the event of an incident, infringement or ongoing legal proceedings, justifying a longer retention period until the fulfillment of the intended purpose (end of investigation; final court decision; ...).

The maximum retention period of eight (8) days is justified by the activity of the Bank, the risks inherent in this activity (both for visitors and staff and generally any person present on the premises of the Bank) and the need to have sufficient time to be able to professionally trace and investigate criminal activities, incidents or claims such as:

- theft or embezzlement of funds;
- fraudulent or criminal use of means of payment;
- identification of the premises before a burglary or other criminal operation;
- assault or armed robbery;
- damage.

## 7. Rights of the people concerned

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You have the following rights, within the limits and conditions imposed by law:

- The right to information: Hoping that this notice has answered your questions, you can contact the Bank's Data Protection Officer (DPO) for any additional information.
- The right to access your data. You can access your data by contacting the Bank's DPO. Please note, however, that the Bank processes a large amount of data and in accordance with the law, you may be asked to specify, before any provision of data, which data or which processing operations your request relates to.
- The right to rectify your data when it is incorrect or obsolete.
- The right to lodge a complaint with the National Commission for Data Protection (CNPD, Complaints Service, 15 Boulevard du Jazz L-4370 Belvaux, [www.cnpd.public.lu](http://www.cnpd.public.lu)) when you consider that the processing of your data does not comply with the law.

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In certain cases and according to the conditions set by law (in which case the Bank will first check that these conditions are met), you also have the following rights:

- The right to request the erasure of your data.
- The right to request the limitation of the processing of your data.
- The right to object to the processing of your data for prospecting purposes or for any other legitimate reason (unless there is a legitimate and compelling reason for the Bank to continue the processing).
- The right to the portability of the data you have provided to the Bank, insofar as this is technically possible.

For any question concerning the processing of your personal data carried out by SG Luxembourg, and for any request relating to the exercise of your rights, you can contact our DPO by email at [lux.dpooffice@socgen.com](mailto:lux.dpooffice@socgen.com) or by post to Société Générale Luxembourg, DPO, B.P. 1271, L 1012 Luxembourg.

For all your requests, please attach a copy of your identity document, so that we can identify you. This notice may change to better protect your personal data. The latest version in force can be consulted on the website of the Bank <https://www.societegenerale.lu/en/donnees-personnelles/>