

# CCTV Privacy Policy

## **Effective date: June 1 2021**

The CCTV system is controlled by The Nine SRL (“The Nine” or “Club” or “we”). This CCTV privacy policy (“Privacy Policy”) describes how we collect, use, share and disclose data relating to you that we may obtain from the surveillance cameras. We comply at all times with the revised Belgian Surveillance Camera Act 2018.

## **Collection of data footage**

The safety and security of all Members and staff is extremely important to us. We use CCTV at the entrances and fire exits of the Club in order to;

- i. Control access to the building and to ensure the security of the building
- ii. Ensure safety of Members, guests, and employees
- iii. Maintain property and information located or stored on the premises
- iv. Prevent, deter, and if necessary, investigate unauthorised physical access
- v. Prevent, detect, and investigate a theft of items or assets owned by the Club, Members, guests or staff, or threats to the safety of employees

All data footage is collected by and for The Nine.

## **Use of data footage**

The purpose of the cameras is not to recognise people unless a security or data protection incident is involved. Nor is the system used as an investigative tool or to obtain evidence in internal investigations or disciplinary procedures, unless a security or data protection incident is involved.

The cameras only collect images caught on camera, no sound or voice is recorded. Nor can the cameras identify or track Members/guests and their movements.

The video images and streaming can be accessed only by Management and the contracted security company.

## **Sharing of data footage**

The Club does not sell or otherwise disclose your personal data collected for this purpose to third parties.

Only government officials such as police, fire department, judicial department, the Belgian data protection authority, etc. can - when required by law - request and receive access to the data footage.

## **Access to data footage**

Members have a right of access to personal data held by the Club. This right may be exercised by emailing us [info@thenine.be](mailto:info@thenine.be). We aim to respond to any requests for information promptly, and in any event within the legally required time limits; currently 30 days.

Modifying the CCTV footage is not allowed. However, Members and guests can modify the report written by the security staff or Management in connection with a security incident, if applicable.

The Club will furthermore inform any Member and/or guest before their information is disclosed for the first time to third parties, or before it's used on their behalf. The Nine will address any request within 30 days from the receipt of the request.

Members and guests have the right to object at any time by sending an email request to [info@thenine.be](mailto:info@thenine.be), when they have legitimate reasons relating to your particular situation.

### **Retention of data footage**

All recorded data is erased automatically after a period of maximum 30 days, when it's overwritten by new video footage.

### **Security of data**

The Nine is committed to protecting the security of personal data. Therefore, we use security technologies and procedures to help us protect personal data footage from unauthorised access, use, or disclosure. Data footage is kept on data on video and computer systems that are limited in access and in controlled facilities.

### **Changes to This Privacy Policy**

If we make any material changes to this Privacy Policy, we will post a revised link on the home page of the website that indicates "Revised Privacy Policy" or a comparable notification about the changes. You should check this website periodically to see if any recent changes to this Privacy Policy have been made. You can also tell if this Privacy Policy has changed recently by reviewing the Effective Date posted at the beginning of this Privacy Policy.

### **About Us**

Our registered company number is 0733756597 and our registered address is Rue Archimède 69, 1000 Brussels. Email: [info@thenine.be](mailto:info@thenine.be). Website: <http://thenine.be>

### **Contact Us**

If you have any questions or complaints about this Privacy Policy or our practices, please contact us at: [info@thenine.be](mailto:info@thenine.be).

If you think that your complaint has not been adequately addressed, you also have the right to lodge a complaint with the Belgian Data Protection Authority: [www.gegevensbeschermingsautoriteit.be](http://www.gegevensbeschermingsautoriteit.be).