

Legitimate Interests Assessment – camera surveillance in NTPS Plc.’s customer service offices		
1.	Legal basis for the use of cameras	Sections 30 and 31(1) of Act CXXXIII of 2005 on Security Services and the Activities of Private Investigators (“Security Services Act”)
2.	Identification and description of the controller’s legitimate interest(s)	By using the surveillance system, NTPS Plc.’s purpose is to protect human life, bodily integrity and property.
3.	Identification and description of the rights and freedoms of data subjects	The image of the data subject may be visible in the recording.
4.	Carrying out the balancing test: justification of the necessity of data processing	Data processing is required to prevent and detect infringements, catch perpetrators in the act, collect evidence for such infringements, as well as to investigate the circumstances of accidents that may occur.
5.	Carrying out the balancing test: justification of the proportionality of data processing	<ul style="list-style-type: none"> – The specific data processing is proportionate given that the data subject’s rights are restricted only to the extent necessary for the aim pursued (<i>i.e.</i> the protection of human life, bodily integrity and property). – Camera surveillance does not entail any adverse effects that would be clearly disproportionate to the legitimate purpose of electronic surveillance. – Furthermore, recording by camera constitutes a restriction of the data subject kept at a minimum, while granting efficiency. – Camera surveillance does not constitute the infringement of human dignity, NTPS Plc. does not operate hidden cameras and does not carry out surveillance in premises where such activity would infringe human dignity. – The areas and premises surveilled by NTPS Plc. are limited solely to those used by it.
6.	How the principle of purpose limitation is implemented	NTPS Plc. shall carry out camera surveillance for the purposes of protecting human life, bodily integrity and property only; the collection of recordings shall be limited to these specific purposes, and NTPS Plc. shall not process such recordings in a manner that is incompatible with those purposes.
7.	How the principle of data minimisation is	Data processing by NTPS Plc. with respect

	implemented	to its camera surveillance activities is adequate, relevant and limited to what is necessary in relation to the purposes of processing (<i>i.e.</i> the protection of human life, bodily integrity and property).
8.	How the principle of storage limitation is implemented	Pursuant to Section 31(2) of the Security Services Act, NTPS Plc. shall destroy or erase the video recording (unless used) within three working days after the date of recording.
9.	How the principle of integrity is implemented	The images captured by the electronic surveillance systems installed in the customer service offices of NTPS Plc. are recorded in secure (closed) server rooms of the respective sites.
10.	Reasons why data subjects may expect that data processing is taking place	Data subjects may expect that data processing will take place because certain activities associated with the movement of cash are carried out in the customer service offices of NTPS Plc., furthermore, certain customers might attempt to make their claims by going beyond socially acceptable boundaries.
11.	Types of security measures implemented	<p>Pursuant to Article 24(1) of the GDPR, NTPS Plc. implements the following technical and organisational measures to ensure that its data processing is performed in accordance with the GDPR:</p> <ul style="list-style-type: none"> – pseudonymisation, encryption of personal data; – ensuring the ongoing confidentiality, integrity, availability and resilience of processing systems and services; – the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; – regularly testing and assessing the effectiveness of technical and organisational measures. <p>In accordance with Article 32 of the GDPR, taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risks to your rights, NTPS Plc. shall implement the following measures with the aims of confidentiality, integrity and availability:</p> <ul style="list-style-type: none"> – physical controls: regulating

		<p>access to the facility of NTPS Plc. and to the computing environment, as well as backup processes (protection against heat, dust, humidity, mechanical damage, theft, criminal damage and potential power outages);</p> <ul style="list-style-type: none"> – administrative controls: NTPS Plc. shall have internal regulations, procedures, directives, business continuity and disaster recovery plans in place (for prevention purposes and to restore the initial situation); – logical controls: NTPS Plc. operates an information security management system developed in accordance with ISO 27001, managing information security in a manner proportionate to the risks.
12.	Data processing for purposes other than those for which the data were initially collected	NTPS Plc. shall not process personal data for purposes other than those for which they were initially collected.
13.	How the rights of data subjects are safeguarded	The rights of data subjects are described in Chapter 5 of the present document.
14.	How data subjects are appropriately informed and the Legitimate Interests Assessment is documented	The rules applicable to data subjects with respect to the data processing activities carried out by NTPS Plc. are published in the form of notices on the company's website and in its customer service offices.

Findings of the Legitimate Interests Assessment: Based on the foregoing criteria, it can be established that the legitimate interests of NTPS Plc. to operate camera surveillance systems in its customer service offices — *i.e.* the protection of human life, bodily integrity and property — override the potential infringements and restrictions of the data subjects' rights associated with such surveillance, given that offences (or even crimes) are likely to be committed in premises open to the public (*i.e.* anyone), designated for complaint handling (and involved in the movement of cash as well).

Budapest, 6 September 2018

NTPS Plc.