



CAMERA POLICY

1. Purpose of the Policy and Data Controller's Identification Information

This is the data management policy for the security camera system (hereinafter: "Policy") operated by Cinema Mystica (hereinafter: "Museum" or "Data Controller") within the museum's internal premises (Budapest, 1052, Párisi Udvar, Petőfi Sándor utca 2-4, exhibition space). This policy defines the data management rules for the closed-circuit camera surveillance system (CCTV) and security camera system.

Purpose of the policy:

- To define the purpose and legal basis for data processing,
- To manage, store, and transfer personal data captured by the system,
- To provide proper information to the data subjects, and ensure their rights and recourse opportunities.

The policy is continuously available on the website www.cinemamystica.net.

For definitions not provided in this policy, the 4th chapter of the museum's data protection and security policy applies.

Data Controller Information:

- Name: Cinema Mystica Korlátolt Felelősségű Társaság
- Headquarters: 1051 Budapest, Vörösmarty tér 5, 1st floor
- Tax Number: 32258123-2-41
- Company Registration Number: 13-09-431282
- Representative: Máté Veégh (Managing Director)
- Email: manager@cinemamystica.hu
- Website: www.cinemamystica.net

The museum uses data processors in the operation of the electronic surveillance system as defined in this policy.

2. Relevant Legislation for Data Management by the Museum

- Regulation (EU) 2016/679 of the European Parliament and Council (April 27, 2016) regarding the protection of natural persons concerning the processing of personal data and the free movement of such data (General Data Protection Regulation, hereinafter: "GDPR").
- Act CXII of 2011 on informational self-determination and freedom of information (hereinafter: "Infotv").
- Act V of 2013 on the Civil Code.
- Act I of 2012 on the Labour Code.
- Act CXXXIII of 2005 on the regulation of personal and property protection and private detective activities (hereinafter: "Szvt").

3. Definitions

- **Data Subject:** A natural person identifiable from security camera footage, particularly employees of the museum, visitors entering the exhibition area, and other persons within the camera's scope.
- **Personal Data:** Any information relating to an identified or identifiable natural person ("data subject"), in this policy, primarily image data.
- **Data Processing:** Any operation or set of operations performed on personal data, including collection, recording, organization, structuring, storage, alteration, retrieval, consultation, use, disclosure, transmission, dissemination, or making accessible, alignment, or combination, restriction, erasure, or destruction.
- **CCTV System:** A closed-circuit video recording system that captures video images indoors with fixed cameras and stores them for a limited time.
- **Pictogram:** A symbol used instead of textual notice to inform individuals about data processing.
- **Operation:** The operation of the surveillance system and its elements, enabling video recording and storage.
- **Legitimate Interest Test:** A documented balancing process carried out in accordance with Article 6(1)(f) of the GDPR to identify the museum's legitimate interest and balance it with the data subject's rights and interests.

Authority: The National Authority for Data Protection and Freedom of Information (NAIH).

4. Purpose of Data Processing, Legal Basis, Data Categories, Data Processors

The purpose of data processing is the protection of high-value technical equipment and exhibits within the museum, the identification of unauthorized individuals entering the exhibition space, recording entries, detecting and preventing unlawful acts, apprehending offenders, providing proof of violations, and ensuring the safety and physical integrity of museum employees and visitors.

Legal basis for processing: The museum's legitimate interest in property and life protection.

Data categories: The image data of museum employees and visitors.

Data processors: The museum's management: Krisztián Sebestyén.

5. Operational Rules, Guarantees, and Data Security

As part of the closed-circuit camera surveillance system, 20 cameras are operational in the exhibition area. The surveillance system records and stores video footage 24/7. The footage is stored on the museum's server, and authorized personnel can monitor the live feed of the cameras.

The museum's employees have been thoroughly informed about the operation of the surveillance system, have acknowledged the content of this policy, and confirmed it with their signatures.

Visitors and other individuals entering the exhibition area are informed about the operation of the surveillance system via visible pictograms and the notice included in the first annex of this policy.

The museum does not have any cameras specifically focused on monitoring individual employees or influencing employee behavior.

The resolution of the images recorded by the security cameras is aligned with the purpose of the system and should be set to the minimum required resolution, considering proportionality.

The equipment used for viewing the footage is positioned to ensure that unauthorized persons cannot view the camera images. If the authorized personnel leave the device or the storage area unattended, they are required to log out of the surveillance software or lock the screen.

It is prohibited to take further footage from the screen, including recording it with another device (e.g., mobile phone).

Access to stored footage is only allowed in a secure manner by authorized persons, and the identity of the accessing individual must be identifiable. The viewing and possible copying of footage must be documented (including the accessing person's identity, the time of viewing, the reason, and any copying made, with an explanation).

The museum takes all necessary technical, organizational, and security measures to protect personal data captured by the camera system from unauthorized access, alteration, transmission, disclosure, deletion, or destruction, as well as from being made inaccessible due to technical changes.

6. Retention Period for Footage, Authorized Access

The retention period for footage recorded by the closed-circuit camera system within the museum's premises is 60 days from the recording date. After this period, unless used as per Section 7 of this policy, the footage must be automatically deleted.

Only the museum management is authorized to access the stored footage.

7. Use and Transfer of Footage

A data subject whose rights or legitimate interests are affected by the footage recording may request in writing to the museum's management, within three days of the recording, to ensure the footage is not deleted or destroyed.

The data subject must provide precise information to identify the footage, such as the date and time of recording.

The viewing of recorded footage must be documented, including the place, time, purpose, identity of the viewers, their role, and details for identifying the footage. This documentation can also be recorded in an electronic register.

The recorded footage can be transferred to authorities involved in investigations or legal proceedings, such as those dealing with misdemeanors, criminal cases, the public prosecutor's office, courts, national security services, or foreign jurisdictions within international legal assistance frameworks.

The museum management must approve the transfer of footage in advance.

Footage may also be used to investigate work-related accidents or conduct disciplinary procedures.

8. Data Subject Rights and Legal Recourse

The data subject is entitled to the following rights regarding the personal data processed:

- To receive information about their rights and recourse opportunities concerning data processing (Section 8.1).
- To request access to their personal data (Section 8.2).
- To request the deletion of their personal data (Section 8.3).
- To request the restriction of their personal data processing (Section 8.4).
- To object to the processing of their personal data (Section 8.5).

These rights may be exercised in writing, using the contact details provided in Section 1 of this policy.

Information regarding the data subject's rights or any data protection incidents should be provided free of charge. However, if the request is excessive or repetitive, the museum may charge a reasonable fee or refuse to act on the request.

If there is suspicion that the data subject did not submit a request for the rights outlined in Sections 8.2, 8.3, 8.4, or 8.5, the museum may only fulfill the request after verifying the identity of the person who submitted it.

If the museum or its data processor refuses to amend, delete, or restrict the processing of the data subject's personal data, the data subject must be immediately informed in writing:

- About the refusal, including legal and factual reasons,
- About their rights under GDPR and the Infotv. and how to enforce them, including the option of requesting assistance from the relevant authority.
- Right to Information for Data Subjects



The data subject is entitled to receive information from the museum or its data processors regarding the facts related to their personal data before the processing starts (right to prior information).

To ensure this, the museum provides information through a pictogram placed at the entrance and in the notice in Annex 1 of this policy, in a concise, transparent, and easy-to-understand format.

Museum employees responsible for data processing must provide all necessary and legally required information clearly and understandably, paying special attention to information aimed at children.

The museum must respond to the data subject's request within 25 days of receipt, without delay, with the information requested.

If the data subject has submitted the request electronically, the museum should provide the information electronically, unless the data subject requests a different format.

The museum displays a pictogram and information in a visible location at the main entrance, allowing the data subject to make an informed decision about entering the monitored area.

9. Right to Access for Data Subjects

The data subject is entitled to request information about:

- The processing of their personal data,
- The purpose, legal basis, and duration of the processing,
- The criteria for determining the retention period,
- The circumstances and effects of any data protection incidents,
- The legal basis, purpose, and recipients of any data transfers,
- The data subject's rights, how to exercise them, and their legal remedies.

The museum must provide this information within 25 days of receiving the request, in an understandable format. If the request is made electronically, the museum should respond electronically if possible.

The data subject may request access to footage recorded about them within 3 days of its creation. The request will be reviewed by the museum management, and the footage cannot be deleted until a decision is made. The viewing must be arranged within 30 days of the request during operating hours, and the data subject will be allowed to view it.

If the data subject requests a copy of the footage containing their image, it may only be provided if the rights of other individuals are not affected. In this case, any other persons shown in the footage must be masked or obscured.

10. Right to Erasure (Right to be Forgotten)

The museum must delete footage without undue delay in the following cases:

- Unlawful data processing,
- Upon the data subject's request (unless the processing is necessary under the law),
- If the data is incomplete or inaccurate and cannot be corrected lawfully,
- If the purpose of processing has ended, or the retention period has expired.

11. Right to Restriction of Processing

The data subject may request the restriction of processing within three days of the recording if they believe it is necessary for the protection of their rights.

The request will be promptly reviewed by the museum management before the automatic deletion. If the request is deemed valid, the footage will be marked and stored separately.

12. Right to Object

The data subject may object to the processing of their personal data for legitimate reasons in writing or by email to the museum management.

The management will make a decision within 25 days. If the request is denied, the museum must provide the reasons for the decision.

The footage will not be deleted automatically until the decision is made.

13. Legal Recourse

- **Complaints to Authorities:** The data subject may initiate an investigation with the authority to review the lawfulness of the museum's actions regarding data processing if they believe their rights have been violated.
- **Judicial Remedies:** The data subject may bring a lawsuit against the museum or its data processor if they believe their personal data has been handled in violation of the applicable laws.

15. Final Provisions

This policy shall come into effect on July 1, 2023.

The heads of the organizational units of Cinema Mystica Immersive Digital Art Exhibition are required to review, interpret, and act with due diligence to comply with the relevant legal regulations and the provisions of this policy.

This policy must be made publicly available to all museum employees, and new employees must be informed about it upon signing their employment contract.

After the policy takes effect, it must immediately be published on the museum's internal website, made available in the customary manner at the premises, and also published on the website www.cinemamystica.net.

Annex 1 - Information on the Operation of the Camera Surveillance System

Monitored Area!

We inform the concerned individuals that a camera surveillance system operates in the exhibition space of Cinema Mystica Immersive Digital Art Exhibition, which captures and records images containing personal data.

The operator and data controller of the camera system is the museum management.

The purpose of the camera surveillance is to protect the technical equipment and exhibited items in the Cinema Mystica Immersive Digital Art Exhibition, identify unauthorized individuals entering the exhibition space, record entries, detect, prevent and apprehend offenders, provide proof of violations, and protect the physical integrity of museum employees and guests.

Legal basis for data processing: The legitimate interest of Cinema Mystica Ltd. in the Cinema Mystica Immersive Digital Art Exhibition.

Scope of the processed data: The images of museum employees and visitors.

Retention period of footage: 60 (sixty) days from the recording (unless used in an official or judicial proceeding or retained upon request of the data subject to assert their rights or legitimate interests).

Authorized personnel to view the stored footage: The museum management.

Data Subject Rights related to Camera Surveillance:

- The data subject may request information about the footage taken of them.
- Within 3 days of the footage creation, the data subject may request access to the footage.
- The data subject may request a copy of the footage containing their image within 3 days, provided that it does not adversely affect the rights of other individuals.



- The data subject may request the deletion of footage unless restricted by another legitimate interest.
- The data subject may request the restriction (i.e., retention) of footage within 3 days if they believe this is necessary for the exercise of their rights.
- The data subject may object to the processing of footage.

In case of violation of rights, the data subject may file a complaint with the National Authority for Data Protection and Freedom of Information (NAIH).

Contact details:

Headquarters: Budapest, Falk Miksa u. 9-11, 1055

Phone: +3613911400

Email: ugyfelszolgalat@nah.hu

Website: www.naih.hu

The data subject may also exercise their right to judicial remedy.

A detailed data management policy for the camera surveillance system is available at the exhibition reception and can be viewed and downloaded from the Cinema Mystica Immersive Digital Art Exhibition website (www.cinemamystica.net).

Annex 2 - Legitimate Interest Test for the Operation of the Camera Surveillance System

According to Article 6(1)(f) of the European Parliament and Council Regulation (EU) 2016/679 (April 27, 2016) regarding the protection of natural persons in relation to the processing of personal data and the free movement of such data (General Data Protection Regulation, hereinafter "GDPR"), personal data can be processed lawfully if it is necessary for the purposes of the legitimate interests pursued by the data controller or a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject, particularly when the data subject is a child.

When applying the legal basis under Article 6(1)(f) of the GDPR, the data controller is required to conduct a legitimate interest test to determine whether the data subject's rights and freedoms are outweighed by the legitimate interests of the data controller and whether the processing activity harms the rights of the data subjects.

Defining the Museum's Legitimate Interest

The legitimate interest of the museum is the protection of valuable technical equipment and exhibits within the exhibition space (approximately €600,000 in total value).

Additionally, there is a legitimate interest in identifying unauthorized individuals entering the exhibition space, recording the fact of entries, detecting unlawful activities, preventing them, apprehending offenders, providing proof of violations, and protecting the physical integrity of museum employees and visitors.

Necessity of Data Processing

The operation of the camera surveillance system is necessary for the protection of exhibited items and the technology operating them, detecting violations, apprehending offenders, preventing unlawful acts, and protecting human life and physical integrity. The closed-circuit camera system plays a crucial role in achieving these goals, as most events can be prevented if potential offenders know their actions are being recorded, and many incidents, accidents, and violations can be investigated by reviewing the footage.

Currently, no technology or solution exists that would allow the reconstruction of events related to violations, accidents, or criminal activities without capturing footage, making it impossible to achieve these goals without using cameras. While a security alarm system could be used for property protection, it would not assist in investigating accidents, uncovering crimes, or identifying offenders. Anonymizing footage or masking individuals would also make it impossible to identify those involved, thus defeating the primary protective purpose of the system. Without storing footage for a period, it could not serve as evidence or be used to verify incidents.

Defining the Interests, Rights, and Freedoms of the Data Subject

The data processing concerns the right of the data subject to their image, a personality right defined in the Civil Code, and their right to informational self-determination, which is ultimately derived from the fundamental human right to human dignity.

The processed personal data consists of security camera footage containing the data subject's image, movement, location, and behavior.

Proportionality of Data Processing

The data processing is proportional because the rights of the data subject are limited only to the extent necessary to achieve the purpose (protection of valuable technical assets, protection of life and physical integrity). The surveillance does not cause a detriment that is disproportionate to the legal aims of the camera surveillance.

The camera's field of view is directed only at areas aligned with its purpose, and the processed personal data is limited to what is absolutely necessary for achieving the data processing goals. These data are stored only for the minimum time necessary to accomplish the objectives.

The camera surveillance does not violate human dignity, as the museum does not use hidden cameras and does not monitor areas where human dignity could be harmed.

The camera surveillance does not extend to monitoring the work of museum staff. The cameras do not have fixed positions or permanent monitoring roles, such as in cash registers.

Assessment of the Effects of Data Processing

Data processing does not impact or limit the data subject's right to informational self-determination or image rights, and it usually occurs in an unequal relationship. However, the processing can have positive effects on the data subject, making the use of security camera footage necessary to protect people and/or property, which are legally protected, socially accepted interests. The protection of life and physical integrity is also in the public interest.

In accordance with reasonable expectations, the data subject should be aware that personal data will be processed based on the legitimate interest of the museum, as they have been properly informed about data processing before it begins.

Data processing, in line with the principles of data minimization and purpose limitation, only involves data that is necessary to achieve the goal. The museum has evaluated the necessity and proportionality of each camera before deployment. The camera system does not record audio.

At the time data collection begins, the museum provides the data subject with clear, comprehensive, and understandable information about the data processed, the legal basis, method, duration, and their rights regarding data processing.

Security Measures

The museum implements the principle of purpose limitation and processes personal data only as long as necessary for achieving the goal or as permitted by law. Footage is stored for the period defined in this policy unless it is used for a purpose.

The museum implements all necessary technical, organizational, and procedural measures to protect the personal data recorded by the camera system from unauthorized access, modification, transmission, disclosure, deletion, destruction, accidental loss, and damage, and also against becoming inaccessible due to changes in the applied technology.

Outcome and Documentation of the Legitimate Interest Test

The legitimate interest test confirms that the museum's legitimate interest in protecting valuable technical assets and displayed installations is genuine, real, and also of societal interest.

The goal of data processing requires technical measures capable of identifying individuals and actions, and visual representation is essential for obtaining accurate information. Therefore, using cameras is not only suitable but also indispensable for achieving the museum's legitimate interest. Additionally, no alternative, less restrictive means are available to achieve the museum's legitimate interest.

Thus, the legitimate interest is necessary, and further proportionality testing is appropriate.

The data processing results in a proportional limitation of the data subject's rights. The data processing has a positive impact on the data subject, and they should already anticipate this processing when the data collection begins. The proportionality of the limitation is further justified by the museum's clear, comprehensive, and understandable information regarding the data being processed, the basis, method, duration, and the data subject's rights.

Based on this, the legitimate interest test concludes that the data subject's rights are not prioritized over the museum's legitimate interests, and the data processing results in a necessary and proportional limitation of the data subject's rights.

Annex 3 - Detailed Description of Camera Locations, Fields of View, and Purposes

Camera 1: Ground Floor Interior

Main entrance and part of the reception area.

- **Personal and property protection**
- **Protection of life and physical integrity**
- **Detection, prevention, and apprehension of unlawful acts**

Camera 2: Ground Floor Interior

Faces Installation 1 (statue).

- **Personal and property protection**
- **Protection of life and physical integrity**
- **Detection, prevention, and apprehension of unlawful acts**

Camera 3: Ground Floor Interior

Faces Installation 2 (pillar).

- **Personal and property protection**
- **Protection of life and physical integrity**
- **Detection, prevention, and apprehension of unlawful acts**

Camera 4: Ground Floor Interior

Faces inward corridor from the right, towards the left corner.

- **Personal and property protection**
- **Protection of life and physical integrity**
- **Detection, prevention, and apprehension of unlawful acts**

Camera 5: Ground Floor Interior

Faces outward corridor from the right, towards the left corner.

- **Personal and property protection**
- **Protection of life and physical integrity**
- **Detection, prevention, and apprehension of unlawful acts**

Camera 6: Ground Floor Interior

In the large exhibition space (Installation 3), faces the entrance and a pillar from the left corner.

- Personal and property protection
- Protection of life and physical integrity
- Detection, prevention, and apprehension of unlawful acts

Camera 7: Ground Floor Interior

In the large exhibition space, from the right corner, faces left.

- Personal and property protection
- Protection of life and physical integrity
- Detection, prevention, and apprehension of unlawful acts

Camera 8: Ground Floor Interior

Views the staircase from below.

- Personal and property protection
- Protection of life and physical integrity
- Detection, prevention, and apprehension of unlawful acts

Camera 9: Ground Floor Interior

Faces Installation 11 from the right corner towards the entrance.

- Personal and property protection
- Protection of life and physical integrity
- Detection, prevention, and apprehension of unlawful acts

Camera 10: Ground Floor Interior

In the shop, faces the right inner corner, near the museum exit.

- Personal and property protection
- Protection of life and physical integrity
- Detection, prevention, and apprehension of unlawful acts

Camera 11: Ground Floor Interior

In the shop, faces the left inner corner towards the interior of the shop.

- Personal and property protection
- Protection of life and physical integrity
- Detection, prevention, and apprehension of unlawful acts

Camera 12: Upper Floor Interior

Views the staircase from above.

- Personal and property protection
- Protection of life and physical integrity
- Detection, prevention, and apprehension of unlawful acts

Camera 13: Upper Floor Interior

Faces Installation 04 from the right corner towards the left corner.

- Personal and property protection
- Protection of life and physical integrity
- Detection, prevention, and apprehension of unlawful acts

Camera 14: Upper Floor Interior

Faces Installation 05 from the left corner towards the entrance.

- Personal and property protection
- Protection of life and physical integrity
- Detection, prevention, and apprehension of unlawful acts

Camera 15: Upper Floor Interior

Faces Installation 06 from the left corner towards the entrance.

- Personal and property protection
- Protection of life and physical integrity
- Detection, prevention, and apprehension of unlawful acts

Camera 16: Upper Floor Interior

Faces Installation 07 from the left corner towards the entrance.

- Personal and property protection
- Protection of life and physical integrity
- Detection, prevention, and apprehension of unlawful acts

Camera 17: Upper Floor Interior

Views the corridor from front to back, towards Installation 09.

- Personal and property protection
- Protection of life and physical integrity
- Detection, prevention, and apprehension of unlawful acts

Camera 18: Upper Floor Interior

Views the corridor from back to front, towards the installation area.

- **Personal and property protection**
- **Protection of life and physical integrity**
- **Detection, prevention, and apprehension of unlawful acts**

Camera 19: Upper Floor Interior

Faces Installation 08 from the left corner towards the entrance.

- **Personal and property protection**
- **Protection of life and physical integrity**
- **Detection, prevention, and apprehension of unlawful acts**

Camera 20: Upper Floor Interior

Faces Installation 10 from the left corner towards the entrance.

- **Personal and property protection**
- **Protection of life and physical integrity**
- **Detection, prevention, and apprehension of unlawful acts**