

# CCTV PRIVACY STATEMENT (LUXEMBOURG)

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## 1.0 Summary and Intent

In accordance with the General Data Protection Regulation (GDPR), this privacy statement describes how the Controller (CIBC Capital Markets (Europe) S.A., 2C rue Albert Borschette, L-1246 Luxembourg), will use personal information about you collected via CCTV cameras on our premises and explains to you your rights under the GDPR in relation to our processing of this data.

### 1.1. Types of information CIBC handles about you

- Personal data, or personal information, means any information about a person from which that person can be identified or which reveals something about a person.
- We will collect, store and use the following categories of personal information about you:
  - CCTV footage
- Personal data may be stored in different ways such as on paper, electronic media, film and/or tape.

### 1.2. Reasons for processing Personal Data

- We will only use your personal information when the law allows us to do so. Most commonly, we will use these CCTV images under the following legal grounds:
  - Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests. This includes Maintaining the security of CIBC premises and equipment.
  - Where we need to protect your interests (or someone else's interests).
  - For the performance of a task carried out in the public interest (e.g.: the prevention of crime).
  - Managing the sickness absence of employees; safeguarding the health, safety and welfare of team members (including in emergency situations) and complying with all applicable laws;
  - Monitoring, documenting, and addressing adherence to CIBC policies or procedures, any relevant contract(s) and/or applicable laws;
  - In circumstances where you are also a client of CIBC, information that we process that arises from that relationship is generally covered by our client privacy policy.
  - Where you are an employee of CIBC, our handling of your personal data is set out in more detail within our Employee Privacy Statement (Europe).

### 1.3. Recipients of Personal Data

We may disclose your personal information only where appropriate and in accordance with data protection legislation) to the following recipients:

- Building security providers for CIBC's real estate;
- Competent authorities (e.g., tax authorities, other governmental bodies, or regulatory agencies); and
- Third-party service providers carrying out processing activities on our behalf; for example, IT administrators and other professional advisers. These service providers will be required to process and retain your personal data in a manner that is consistent with this privacy statement and data protection legislation.

Personal data may also be processed by and shared between CIBC and its subsidiaries worldwide, and each of these entities may process such information for the purposes described in this privacy statement. Where personal data is transferred outside of the United Kingdom, Luxembourg or the European Economic Area (EEA), we will ensure that appropriate safeguards are in place for the personal data.

### **1.3.1. Sharing Personal Data with other third parties**

Your personal data will not be disclosed to third parties other than those set out above, unless required by applicable law, regulation or order of a competent court.

### **1.3.2. Processing outside of the United Kingdom, Luxembourg or EEA**

Your personal data may be transferred to countries outside the United Kingdom or EEA where data protection rights may not be protected to a standard equivalent to that of Luxembourg. We will take steps to ensure that appropriate safeguards are in place to protect this data, as set out below. In most cases, the specific countries outside the EEA to which we may send your personal data are Canada and the United States.

Finally, personal data may also be processed by and shared between CIBC and its subsidiaries worldwide, and each of these entities may process such personal data for the purposes described in this privacy statement. CIBC has an Intragroup Data Transfer Agreement in place to ensure compliance with GDPR when transferring personal data between its offices.

## **1.4. Retention Periods**

Personal data will be retained in accordance with the CIBC and the applicable records retention schedule, and for no longer than is necessary to serve the purposes for which it was processed. In the case of CCTV records, images from the CCTV cameras will be deleted 8 days after they were created, except in cases of incident or potential criminal offence in which case, we will retain for a maximum of 30 days.

## **1.5. Data Subject Rights**

Pursuant to data protection legislation, you may make the following requests in relation to your personal information.

### **1.5.1. Requests to access Personal Data**

By law you have the right to request access to your personal information (a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

### **1.5.2. Requests to restrict processing of Personal Data**

You may request that we restrict the processing of your personal data where one of the following applies:

- You contest the accuracy of the personal data;
- The processing is unlawful, but you do not want the personal data to be erased and you request restriction instead;
- We no longer require the personal data for the purposes of processing, but you still require it in connection with a legal claim; or
- You have objected to the processing.

### **1.5.3. Requests to prevent processing of Personal Data**

You may object to the processing of your personal data (including profiling) where the legal basis of the processing is CIBC’s legitimate interests or the public interest, in which case we will stop processing until we are able to verify that we have compelling legitimate grounds for processing that override your interests, rights and freedoms with regard to your personal data, or if we need to continue processing for the establishment, exercise or defense of legal claims.

#### **1.5.4. Requests to amend or erase Personal Data**

You may request the erasure of your personal data in certain circumstances, including where the personal data is no longer necessary in relation to the purposes for which it was processed.

We may refuse a request for erasure in certain circumstances, including where the personal data is required for us to comply with a legal obligation or for the establishment, exercise or defence of legal claims.

#### **1.5.5. Responding to requests**

Where you make a request as set out above, we will provide information on actions taken on your request without undue delay and within 1 month of receiving your request. In certain circumstances, this may be extended by 2 additional months.

## **2.0 Contacts**

Questions about this privacy statement, or requests to exercise the rights above, should be addressed to the Data Protection Officer at [Mailbox.DPO@cibc.com](mailto:Mailbox.DPO@cibc.com)

## Appendix — Definitions

For the purposes of this privacy statement, the following definitions apply.

**Controller:** The controller is CIBC Capital Markets (Europe) S.A., 2C rue Albert Borschette, L-1246 Luxembourg

**Data protection legislation** refers to the EU General Data Protection Regulation (2016/679) (GDPR), the UK Data Protection Act 2018, and any other applicable data protection or privacy legislation that applies in Luxembourg.

**Data Protection Officer:** The data protection officer can be contacted in relation to this privacy statement at [Mailbox.DPO@cibc.com](mailto:Mailbox.DPO@cibc.com).

**Individuals** means current and former team members, as well as applicants for employment.

**Process** means to perform any operation or set of operations on personal data or sets of personal data, whether or not by automated means, including to collect, record, organize, structure, store, adapt or alter, retrieve, consult, use, disclose by transmission, disseminate or otherwise make available, align or combine, restrict, or erase or destroy.