

[REDACTED]

Case handler :

Paris, 1 July 2025

Ref No: [REDACTED]

Referral N° [REDACTED]

(to be quoted in all correspondence)

Dear Sir,

You have lodged a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL) against the company [REDACTED], concerning the promotion and installation of video surveillance systems [REDACTED], without access to the images and without declaration to the prefecture.

As you know, in application of the mechanisms for cooperation between authorities provided for in the General Data Protection Regulation (GDPR), the CNIL has forwarded your complaint to the Dutch data protection authority, insofar as [REDACTED] is established in the Netherlands and falls within the jurisdiction of this authority.

Pursuant to Article 77 of the General Data Protection Regulation (GDPR), I hereby inform you of the decision adopted in this case by the Dutch data protection authority, following this European cooperation procedure.

The Dutch authority considers that [REDACTED] is not responsible for the [REDACTED] video recordings under the GDPR. The [REDACTED] themselves decide how to install the equipment, capture the images and store them. The Dutch authority therefore considers that [REDACTED] are responsible for their own compliance with local legislation, particularly in terms of informing [REDACTED], storing videos and obtaining authorisation from the local authorities. [REDACTED]'s responsibility only comes into play once the video captures have been uploaded to the dedicated platform.

However, the Dutch authority notes that the instructions given to [REDACTED] on how to install and use the recording devices are not clear, and will remind [REDACTED] of the importance of its role in providing these instructions with regard to compliance with local legislation.

With regard to the issue of the publication of video recordings on platforms such as Youtube or Facebook (in particular via communities such as [REDACTED] or the [REDACTED] [REDACTED]), the Dutch authority has taken due note of these remarks and has passed them on to [REDACTED] so that the company can take appropriate sanctions, as mentioned in their [REDACTED]

In view of all these elements, I would like to inform you that your complaint has been closed.

Yours faithfully



Rights and Complaints Department

Subject to the applicant's interest in taking action, CNIL decisions may be appealed to the Conseil d'Etat within two months of notification, plus :

- one month for persons residing in Guadeloupe, French Guiana, Martinique, Reunion Island, Saint-Barthélemy, Saint-Martin, Mayotte, Saint-Pierre-et-Miquelon, French Polynesia, the Wallis and Futuna Islands, New Caledonia and the French Southern and Antarctic Territories;*
- two months for persons living abroad.*