



## Privacy Statement Camera Surveillance NN Netherlands

This Privacy Statement informs you about the way in which NN Group N.V. and/or its subsidiaries and affiliates located in the Netherlands (jointly referred to as “NN”, “We”, “Us” or “Our”), processes personal data about you when about you when applying camera surveillance at our offices in the Netherlands. If you have any questions on the application process or on how we handle your personal data, please contact us using the contact details below.

This Privacy Statement was last updated on 21 April 2026.

This Privacy Statement may be further updated from time to time. Any amendments of this Privacy Statement become effective upon their publication in the last updated Privacy Statement, which can be found at the receptions of each individual premises, via the QR code on the informative boards in and around our offices, and on our website: [www.nn-group.com/privacy-statement](http://www.nn-group.com/privacy-statement).

### 1. When does this Privacy Statement apply?

This Privacy Statement specifically describes how we process your personal data when applying camera surveillance at our offices in the Netherlands. However, we may also process your personal data in another context, for example when you have an appointment at one of our offices or make use of our services. Please refer to our general privacy statement [www.nn-group.com/privacy-statement](http://www.nn-group.com/privacy-statement).

If we also processes your personal data for other purposes, another specific Privacy Statement may apply to this processing. In that case you will be separately informed about this.

This Privacy Statement is not applicable to service provisions of third parties for which these third parties are themselves responsible. Think for example of cameras of third parties (such as building owners) that are placed in such way that they also record buildings and sites of NN. For information about how these third parties process your personal data, we refer you to the privacy statements and/or other information supplied by these parties.

### 2. Who is responsible for the processing of your personal data?

This Privacy Statement informs you about the processing of your personal data in the context of camera surveillance at our offices in the Netherlands, for which NN Group and/or its Dutch subsidiaries and affiliates are responsible. It concerns the following offices:

Office (location)	Relevant NN company
Haagse Poort (The Hague)	NN Group NN Non-Life NN Life & Pensions NN Bank



	NN Re
Delftse Poort (Rotterdam)	NN Group NN Life & Pensions NN Bank
Landmark (Arnhem)	NN Life & Pensions NN Non-Life OHRA
Oval Tower (Amsterdam)	NN Group NN Life & Pensions NN Non-Life BeFrank
IJsseltoeren (Zwolle)	ABN AMRO Verzekeringen
Helmond Office (Helmond)	NN Life & Pensions
Nieuwegein Office (Nieuwegein)	Movir

When submitting questions or requests, please indicate the relevant office location(s). If you submit your request via the contact details below, we will ensure that it is sent to the correct contact person.

### **3. Which personal data is used for what?**

#### **3.1 Purposes of processing personal data for the following purposes**

We place cameras and process your personal data for the following purposes:

- the protection of the health and safety of persons;
- (supporting) the security of (access to) the buildings and premises of NN and the prevention of burglary, theft and vandalism;
- the monitoring of materials and information located in the buildings or on the premises of NN; and
- the recording of incidents.

Recorded camera images can then also be used for:

- investigating and handling (possible) incidents;
- processing requests, complaints and disputes;



- accepting, exercising and defending our rights; and
- complying with legal obligations and professional regulations, and requests of authorized government institutions.

### 3.2 The persons involved in camera surveillance

As part of our camera surveillance, we process personal data about the following categories of persons.

- **Persons being filmed:** This concerns all persons who come within the visual range of one of our cameras. As far as persons are concerned, this depends on where the camera is installed. For example, a camera in a hall can capture images of all kinds of visitors to one of our offices, while a camera in a certain department will in principle only capture images of people with access to that department.
- **Persons with request in relation to camera images:** This concerns persons who have submitted a request in relation to certain camera images, without necessarily being shown on these images themselves. Think, for example, of a request to find out how someone's car was damaged, or someone's request to erase certain camera images when someone doesn't even appear to be on them.
- **Persons who have/can have access to camera images:** This concerns persons who have or can have access to the camera images on the basis of their access rights. Think for example of security staff, but also IT or helpdesk staff in case of connection problems. Please refer to the section "Who has or will have access to your personal data" below.
- **Persons who have access to camera images:** This concerns persons who, on the basis of our logging and other records, have been given actual access to certain camera images. In addition to the above examples, think here also of persons involved from, for example the police.

### 3.3 The types of personal data we process at camera surveillance

With our camera surveillance, we process the following categories of personal data:

- Personal data relating to persons being filmed
  - The camera images themselves;
  - Time of an image capture;
  - Location of an image capture;
  - Written report of an image capture;



- Data regarding who has/can have access to the camera images;
  - (Log) data regarding who actually had access to the camera images; and
  - Data relating to a related request or communication (e.g. when reporting an incident such as theft or vandalism).
- Personal data relating to persons who have/can have access to camera images.
- Name, job title, department and contact information;
  - The type of camera images to which the person has/can have access and possibly the conditions for it.
- Personal data regarding persons related to the camera images by request or communication.
- Name, job title and contact information;
  - Information about the link between this person and the request or communication regarding certain camera images.

### **3.4 The legal basis on which we base the processing of personal data in case of camera surveillance**

We base the processing of your personal data at our camera surveillance on the legal basis 'legitimate interests'. This means that a balance of interests is performed between the interests that are served by the processing on the one hand and your privacy interests on the other hand, and that the interests of the processing weigh more. Our interests in the processing of personal data consist of the realisation of the purposes mentioned in the subsection "Purposes of processing personal data within the framework of camera surveillance" above.

Aspects taken into account when balancing interests

When weighing up the interests, the following aspects were taken into account, where relevant:

- If other solutions that have less privacy impact can be applied instead of camera surveillance (e.g. improved physical security or access control);
- The number of people filmed (e.g. purely the number or in relation to a certain group);
- The way the camera images are used (e.g. only consulted in case of an incident, versus always being analysed);
- The reasonable expectations of the persons being filmed (e.g. no camera surveillance in toilets); and

As privacy friendly as possible



When using a camera, we investigate how this can be done in a way that minimizes invasion of the privacy of the persons being filmed. For example, we take into account as far as relevant:

- The kind of camera used;
- The range of the camera and how it is adjusted;
- At what times camera surveillance takes place;
- Whether the camera images are recorded or not and - if so - for how long; and
- Who has access to the camera images under which conditions.

For each camera, NN can substantiate why it was placed at a certain location, along: why creating images is necessary to achieve that purpose and which of the above safety precautions NN has taken to prevent or limit undesirable consequences for the privacy of the persons being filmed. In addition, if you want more information about balancing of interests, you can contact us directly via our contact details below.

#### 4. How do we obtain your personal data?

We obtain your personal data in different ways:

- **Observed and/or recorded by us:** When applying our camera surveillance, we process data about the persons shown on the camera images.
- **Supplied by you:** Some personal data we receive straight from you. Think for example of data you provide us when you request access to certain camera images.
- **Internally received:** It is possible that we could receive your personal data from other NN systems. Think for example of research in internal systems that is carried out following an incident - such as vandalism - that is shown on certain camera images.
- **Received from third parties:** We could also receive your personal data from other persons or external parties. Think, for example, of information obtained from colleagues or the police when investigating an incident - such as vandalism - that is shown on certain camera images.
- **Automatically obtained:** We obtain some personal data automatically. Think for example of the date and time to which camera images relate, which can be tracked automatically.

#### 5. Do we use profiling and/or automated decision-making?

As part of our camera surveillance process, we do not use any form of profiling and/or automated decision-making.

#### 6. How long do we retain your personal data?

In general, we do not keep personal data longer than is necessary for the purpose of the processing. We delete camera images within two weeks after recording, unless:



- **Incident:** In the event of an incident camera images may be kept longer to investigate and/or deal with the incident;
- **Retention obligation:** To comply with a minimum retention term or other legal obligations resting on us based on applicable law; or
- **Procedure:** Your personal data is necessary in the framework of a legal procedure.

## 7. Who has or will have access to your personal data?

Camera images and related personal data may be shared on a need-to-know basis with authorized persons within one of the parties listed below. Within NN these are the designated employees of Security, Facility Management (FM) and Corporate Security Investigation (CSI). "Need-to-know" means that a party only gets access to personal data if and insofar as this is necessary to perform the activities performed by this party.

- The relevant NN office location.
- Service providers/subcontractors engaged by NN, who are involved in relevant processing activities. Think, among other things, of the possible external supplier of a camera.
- A party that is also involved in the processing of personal data. Think here about any external owner of the building/plot on which the camera surveillance is focussing, involved insurers, professional advisors such as lawyers who have been called in as part of an incident, external investigators/research agencies who have been called in as part of an incident, and the victims of an incident.
- Authorised government institutions. For example, the police or other competent government agency if it is involved in following up an incident or otherwise requests footage to which NN must respond.

When we use services of a party who processes your personal data on our behalf, acting as a data processor, we have concluded appropriate data processing agreements in line with applicable data protection laws.

## 8. How do we transfer your personal data outside the European Economic Area (EEA)?

The processing of your personal data may entail the transfer of your personal data to NN group companies and selected third parties.

The NN group companies are located in the EEA, except for NN Japan (NN Life Insurance Company, Ltd). If transfer of personal data to NN Japan is necessary, we will rely on an adequacy decision of the European Commission for such transfer.

Our selected third parties may be located outside of the EEA. Where applicable, we rely on an adequacy decision of the European Commission for the transfer of personal data to a non-EEA country or have taken appropriate safeguards to transfer your personal data to a country located outside the EEA, if that country does not provide an adequate level of protection according to the applicable data protection laws.

You can contact us using the contact details below, if you would like to receive more information on the measures taken to safeguard your personal data in this respect.



## 9. How do we protect your personal data?

We are committed to ensure the protection of your personal data and privacy. In order to prevent unauthorized access or disclosure, we have put appropriate physical, technical and organizational measures in place to safeguard the personal data we collect and process.

## 10. What are your privacy rights?

As a data subject, you have certain rights concerning our processing of your personal data. These are as follows:

- **Request access to your personal data:** You have the right to ask us if we are processing your personal data, and, if so, obtain from us a copy of that personal data.
- **Request correction of your personal data:** You have the right to request us to rectify your personal data, if you believe that the personal data we have about you is incomplete or inaccurate. If we have shared your personal data with others, we will also inform them of the correction where possible.
- **Request erasure of your personal data:** You have the right to ask us to delete or remove your personal data in some circumstances. If we have shared your personal data with others, we will inform them of the erasure where possible.
- **Request to restrict our processing of your personal data:** You have the right to ask us to block or suppress the processing of your personal data in certain circumstances, such as where you contest the accuracy of that personal data or you object to us processing your personal data. If we have shared your personal data with others, we will inform them of the restriction where possible.
- **Request to exercise your right to data portability:** You have the right to obtain personal data you have provided to us in a structured, commonly used and machine-readable format in certain circumstances.
- **Object to the processing of your personal data:** You have the right to ask us to stop processing your personal data, if we are relying on legitimate interests to process your personal data, unless we can demonstrate compelling legal grounds for processing.

You may send us a request via [FM.Securitymanagement@nn-group.com](mailto:FM.Securitymanagement@nn-group.com). We will handle your request carefully and in line with the applicable data protection rules.

If you feel that we have not handled your request satisfactory, or if you have a complaint, please contact our Group Data Protection Officer via [dpo-office@nn-group.com](mailto:dpo-office@nn-group.com). You also have the right to lodge a complaint with the [Dutch Data Protection Authority](#), if you have a concern about the way we handle your personal data.



## **11. Our contact details**

Please contact us if you have any questions. You may use the below contact details:

**NN Group N.V.**

**Office: NN Group Facility Management**

Schenkkade 65

2595 AS The Hague

P.O Box 90504

2509 LM The Hague

Email: [FM.Securitymanagement@nn-group.com](mailto:FM.Securitymanagement@nn-group.com)

NN Group N.V. has its official seat in Amsterdam, Trade Register number 52387534.