

Privacy Notice on the processing of personal data through CCTV System

1. Data Controller:

“369AV PRIVATE COMPANY”, headquartered in Athens Municipality, on 3-5, Anaxagora str, PC 105 52, Greece, telephone number: 210 3412 369.

2. Purpose and legal basis of the data processing:

We use closed-circuit television (CCTV) in order to protect natural persons and goods (security). The processing is necessary for the purposes of the legitimate interests we pursue as a data controller (article 6 para. 1. (f) GDPR).

3. Legal interests

Our legal interest is the need to protect our premises, and the goods therein included against illegal actions, such as, indicatively, thefts. We also need to ensure life safety, physical integrity, health as well as the property of our staff and third parties lawfully located in the areas under surveillance. We only collect image data and limit the surveillance to places where we have previously assessed that there is an increased possibility of illegal actions e.g. such as thefts, in the entrance and exit points, without focusing on places where privacy of the persons captured by the CCTV may be severely restricted, including their right to respect their personal data.

4. Recipients

The material held is accessible only by our competent / authorized personnel who is in charge of security of the premises as detailed above or/and by external security companies, assigned with the monitoring and management of the CCTV system, to which the assignment of data processing has been concluded in writing in accordance with the specific conditions set out in Art. 28 of the GDPR.

This material shall not be disclosed to third parties except in the following cases: (a) to the competent Judicial, Prosecutorial and Police Authorities when it contains information necessary to investigate a criminal offense involving persons or goods of the data controller; (b) to the competent Judicial, Prosecutorial and Police Authorities when lawfully requesting data within the performance of their duties, and (c) to the victim or perpetrator of a criminal offense, in the case of data which may constitute evidence of the offense.

5. Data Retention

We keep the data for fifteen (15) days, subject to more specific provisions of the legislation in force, following which, they are automatically deleted. If during these periods an incident occurs, we isolate part of the video and keep it on a separate file for up to thirty (30) days in order to investigate the incident and initiate legal proceedings to defend our legal interests, while if the incident concerns third parties, we will keep the video for up to three (3) more months.

6. Data Subjects' rights

Data subjects have the full range of rights as provided in chapter III of the GDPR, whereas in basic CCTV surveillance systems, the data subjects have in principle the following rights:

- Right of access: you have the right to know if we process your image and if so, to receive a copy of it
- Right to restriction of processing: you have the right to request us to restrict processing, for example, you may ask us not to delete data that you deem necessary to establish, exercise or support legal claims.
- Right to object: you have the right to object to the processing.
- Right to erasure: you have the right to request that we erase your personal data.

You may exercise your rights by sending an e-mail to dpo@gekterna.com or a letter to our postal address 85, Mesogeion Avenue, PC 11526 or by submitting the request to us in person, at the seat of the Company. To examine a request related to your image, you should tell us when you were within the range of the cameras and give us a picture of you to facilitate us to locate your data and hide the data of third parties pictured. Alternatively, we give you the opportunity to come to our facilities to show you the images in which you appear. Moreover, we would like you to note that exercising the right to object or the right to erasure does not imply the immediate erasure of data or the modification of the processing. In any case, we will answer you in detail as soon as possible, within the deadlines set by the GDPR.

7. Right to lodge a complaint

In case you consider that the processing of your data violates Regulation (EU) 2016/679, you have the right to lodge a complaint with the competent Supervisory Authority (www.dpa.gr) through its online portal (<https://eservices.dpa.gr/>). For more information, please consult the website of the Hellenic Data Protection Authority.