



## **Information on processing of personal data through video devices**

### **1. Data Controller:**

MACEDONIAN HOTELS S.A., 11 Komnion str., Thessaloniki, tel. 2310242700

### **2. Purpose and lawfulness of processing:**

We use video devices (CCTV) in order to protect people and properties. Processing is necessary for the purposes of the legitimate interests we pursue as data controller [art. 6.1(f) GDPR].

### **3. Legitimate interests definition**

Our legitimate interest consists in the necessity to protect our property and the goods located in it from illegal acts, such as theft. The same applies to the safety of life, physical integrity, health as well as the property of our staff, clients and other third parties legally located in the monitored area. We only collect image data and limit the surveillance to areas where we have assessed an increased likelihood of illegal activity, without focusing on areas where the privacy of the persons being monitored may be severely restricted, considering their right to respect for personal data.

### **4. Recipients**

Stored material is accessible only by our competent / authorized personnel and associates who are in charge of the security of the space. This material shall not be transmitted to third parties, except in the following cases: (a) to the competent judicial, prosecutorial and police authorities when it contains information necessary for the investigation of a criminal offense involving persons or property of the controller; (b) to the competent judicial, prosecutorial and police authorities when requesting data, lawfully, in the performance of their duties, and (c) to the victim or perpetrator of a crime, in the case of data which may constitute evidence of the act.

### **5. Storage period**

We store data for seven (7) days, after which they are automatically deleted. In the event that during this period an incident occurs, we isolate part of the video and store it for another (1) month, in order to investigate the incident and initiate legal proceedings to pursue our legitimate interests, while if the incident concerns third parties we will store the video for up to three (3) more months.

### **6. Data subjects' rights**

Data subjects have the following rights:

- Right of access: you have the right to know if we are processing your image and, if so, to receive a copy of it.
- Right to restriction: you have the right to obtain from us restriction of processing, such as not deleting data that you deem necessary to establish, exercise or support legal claims.
- Right to object: you have the right to object to processing.
- Right to erasure: you have the right to obtain from us the erasure of personal data concerning you.

You can exercise your rights by sending an e-mail at [dpo@onresidence.gr](mailto:dpo@onresidence.gr) or a letter to our postal address or by submitting the request in person, at the address of our headquarters. In order to process a request related to your image, you should inform us when approximately you were within range of

the cameras and provide us with a clear photo of you to help us locate your data and anonymize the data of third-parties. Alternatively, we give you the opportunity to visit our facilities in order to show you the images in which you appear. We also note that exercising the right of objection or erasure does not imply the immediate erasure of data or the modification of the processing. In any case, we will answer your request in detail as soon as possible, within the deadlines set by GDPR.

#### **7. Right to lodge a complaint**

In case you consider that the processing of data related to you infringes Regulation (EU) 2016/679, you have the right to lodge a complaint with a supervisory authority.

Competent supervisory authority for Greece is the Data Protection Authority, 1-3 Kifissias ave, 115 23, Athens, <https://www.dpa.gr/> , tel. 2106475600.