



Privacy Notice regarding CCTV

Revision date: February 2022

This Privacy Notice applies to Deloitte Greece Entities, which are:

1. "Deloitte Business Solutions Societe Anonyme of Business Consultants" with the distinctive title "DELOITTE BUSINESS SOLUTIONS SA",
2. "Deloitte Certified Public Accountants Societe Anonyme" with the distinctive title "DELOITTE.", and
3. "Koimtzoglou-Bakalis-Venieris-Leventis & Associates Law Partnership" with the distinctive title "KBVL Law firm",

(collectively the "Firm"), in compliance with applicable national and European legislation on data protection, hereby informs you with respect to the collection and processing of your personal data through the firm's CCTV system.

This Privacy Notice is intended to adequately inform our employees and other people visiting the premises, about the use of CCTV. Please, read the following information carefully and let us know if you have any questions by contacting the Firm's DPO, at DataPrivacyOfficer@deloitte.gr.

The Privacy Notices are posted on the Firm's intranet and are available in hardcopy at the office of the DPO.

Useful Definitions

'Personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

'Processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

'Controller' means the natural or legal person, public authority, agency or other body which alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

'Processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

'Third party' means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;

Why and how we use the CCTV system

The CCTV (closed-circuit television) system allows the use of video cameras to monitor the interior and exterior of a property, transmitting the signal to a monitor or set of monitors. Our Company would like to assure you that has the utmost respect for your rights and deeply values your dignity and privacy. We use CCTV only when and where it is necessary and only for specific purposes, as described below:

The Firm aims to maintain the safety of all personnel, the premises and the Firm's and personnel's equipment and devices. We also aim to prevent any illegal actions against the persons and their property. The CCTV system is used to protect both you and the Company, both the safety of people and property.

It is very important to take into account that the CCTV records only images and no sound. Moreover, the cameras do not have zooming capabilities. The cameras are placed at the entrances and exits of the offices and of the building as well as the parking space of the building. There are no cameras in waiting rooms, in the employees' offices or however focusing on working desks or in any other place within the building, except for its entrances and exits, as mentioned above.

It is also important to inform you, that the Firm does not use the recorded material to evaluate your efficiency at your job, nor to monitor your working hours. The CCTV has no effect on the way we treat you and it is not being used to surveil you during your activities, but only to ensure the safety of the persons and the premises.

Categories of personal data we process

As already mentioned, we record only your image. We do not record your voice or any other personal information.

Legal basis for processing

The Firm processes data collected through CCTV on the basis that the processing is necessary for the purposes of the legitimate interests pursued by the Firm (security of the premises and the people) (GDPR art. 6 par. 1f).

Who we disclose your information to?

The Firm does not transfer the recorded videos to anyone outside the Firm. They are destined for internal use only. Certain members of our staff, such as members of the IT team, as well as members of the staff of "G4S SECURITY SYSTEMS AND MONITORING SERVICES (GREECE) SA", our subcontractor providing security services and "Maroussi Plaza Investment Properties S.A." as building manager and responsible for CCTV system maintenance, may have access to the recorded material, but they are bound with non-disclosure agreements.

However, the Firm might be obliged by law or by competent authorities to share certain scenes of recorded videos. This could happen especially if an illegal action has been recorded which we have to report, or if the judicial or other competent authorities request to review those scenes.

We always bind our partners with privacy agreements and/or confidentiality clauses.

Data retention period

CCTV images are retained for fifteen (15) working days and then they are deleted in a safe way. However, the Firm may have to retain certain recorded scenes if they depict the performance of illegal actions. In this case the retention of the images vary between 30 days and 3 months, unless the opening of a criminal case requires the keeping of the data for additional time periods as required by Court authorities or the law pending the Court case.

Your Rights

As a data subject, you have the right to:

Right to information and access: You have the right to be informed and to have access to your personal data and your medical records and to receive additional information concerning their processing.

Right to erasure (right to be forgotten): You have the right to obtain the erasure of your personal data in the cases that such right is not restricted by obligations under applicable law or otherwise.

Right to restriction of processing: You have the right to obtain restriction of processing of your personal data when: a) the accuracy of your personal data is contested and until the accuracy of the data is verified; b) the processing is unlawful and you oppose to the erasure of your personal data and request the restriction of their use instead; c) your personal data is no longer needed for the purposes of the processing, but they are required for the establishment, exercise or defense of legal claims; and d) you have objected to the processing pending the verification whether there are legitimate grounds concerning the Firm and overriding those for which you oppose to the processing.

Right to object the processing: You have the right to object any time to processing of your personal data when the processing is necessary for purposes of legitimate interests pursued by the Firm.

Right of complaint to the DPA: You have the right to lodge a complaint to the Greek Data Protection Authority (www.dpa.gr): Telephone: +30 210 6475600, Fax: +30 210 6475628, Email address: complaints@dpa.gr.

To exercise any of your rights or make a complaint to us relating to your personal data or if you have any other questions about our use of your personal data, please send an email to: DataPrivacyOfficer@deloitte.gr.

However, should you have a complaint or question, it is advisable to contact the Firm first, in order to try and solve the matter amicably.