



## INFORMATION ABOUT THE PERSONAL DATA PROCESSING BY CLOSED VIDEO-SURVEILLANCE CIRCUIT (CCTV)

**Circet Hellas** operates closed circuit video-surveillance system (CCTV) in its facilities, that records on a **24-hour basis** images of visitors and employees in the Company's premises (internal and external). The recording meets the requirements and provisions of the current legislation.

### 1. DATA CONTROLLER – CONTACT DETAILS

**Circet Hellas Single Member P.C.** (Commercial Title: **Circet Hellas A.E.**)

Address: 68A Spaton Avenue, P.C. 15344, Gerkas Greece

Phone: (+30) 210-661 4855

Email: [info@circet.gr](mailto:info@circet.gr)

### 2. DATA PROTECTION OFFICER

For the matters, concerning the processing of personal data you can contact the Company's Data Protection Officer (DPO) at [dpo@circet.gr](mailto:dpo@circet.gr).

### 3. PURPOSES & LEGAL BASIS OF THE PROCESSING

Χρησιμοποιούμε σύστημα βιντεοεπιτήρησης με αποκλειστικό σκοπό την **ασφάλεια και προστασία φυσικών προσώπων, αγαθών, περιουσίας και εγκαταστάσεων** (π.χ. πρόληψη βανδαλισμών, υλικών ζημιών και κλοπής, προστασία από μη εξουσιοδοτημένη πρόσβαση, προστασία από πυρκαγιά, προστασία των εργαζομένων κλπ.).

We operate a video-surveillance system exclusively for ***the safety and protection of the Company's staff, visitors, goods, properties and facilities*** (e.g. prevention of vandalism, material damage and theft, protection against unauthorized access, fire protection, employees' protection etc.).

The video surveillance system is under no circumstances used to monitor the employees within the Company's premises. **Circet Hellas** is committed and declares that under no circumstances will the data collected through the video surveillance system (CCTV) be used as the exclusive criteria for evaluating the efficiency or behavior of the employees.

We only collect images from the Company's entrances (internal and external), the server room, the Company's external perimeter areas, the parking areas and the warehouse, without any excessive violation of privacy.

***There is no sound recording.***

The legal basis of the processing is the **defense of the Company's legitimate interests**, according to the article 6 par. 1-f of the General Data Protection Regulation (EU) 2016/679.

Our "**legitimate interests**" means the protection of the area and the goods located in it from illegal acts, such as theft, fire or unprovoked destruction. Moreover, we ought to protect the safety of life, physical integrity, health and property of the Company's employees and visitors.

#### **4. RECIPIENTS OF THE PERSONAL DATA**

The data collected through the CCTV system are kept in a digital file, located in special area of the Company and which is accessible only by authorized personnel.

This material **is not transmitted to third parties** except in the following cases: i) to the competent judicial, prosecutorial and police authorities when it contains information necessary for the investigation of a criminal offense concerning persons or property of the data controller, ii) to the competent judicial, prosecutorial and police authorities when they request data, lawfully, during the exercise of their duties and iii) to the victim or perpetrator of a criminal offense, in the case of data which may be evidence of the offense.

#### **5. STORAGE PERIOD OF THE PERSONAL DATA**

The data recorded in the system are stored for 14 days, after which they are automatically deleted and it is impossible to retrieve them. If we become aware of an illegal incident, we will maintain the specific record in a separate file for 1 month, in order to investigate it and initiate legal proceedings for the defense of our legitimate interests. If the incident concerns a third party, we may keep the specific record in a separate file for 3 months.

#### **6. DATA SUBJECTS' RIGHTS IN RELATION TO THE PERSONAL DATA**

You can exercise the following rights regarding the processing of your personal data:

- **Right of access**

You have the right to know if we process your image and request a copy of it.

- **Right to erasure («right to be forgotten»)**

You have the right to request the erasure of your personal data

- **Right to restriction of processing**

You have the right to request the restriction of processing of your personal data:

- When their accuracy is contested by you and until we make their relevant verification
- Alternatively, instead of their erasure

- When they are no longer necessary for the processing purposes for which we have collected them, but they are required by you for the establishment, exercise or defense of legal claims
- When you object to their processing and until it is verified that there are legitimate reasons for such processing by the Company

- **Right to object**

You have the right to object to the processing of your personal data when it is based on a legitimate interest

*[Please note that in the typical cases of video-surveillance systems the rights of access, erasure, restriction and object apply. The rest of the data subjects' rights may apply only in exceptional cases].*

You may exercise your above-mentioned rights as well as pose any question, complaint or ask other information regarding the processing of your personal data, by contacting στο [dpo@circet.gr](mailto:dpo@circet.gr) or the contact details mentioned in paragraph 1.

In order to investigate a request regarding your image, you must specify the date and approximate time of the recording, as well as the relevant area of the Company. This way you facilitate the investigation of your own data while you also contribute to the prevention of the reveal of other people's data. Alternatively, we offer you the possibility to come to our facilities 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 reply to you in detail as soon as possible, within the time set by the GDPR.

## **7. RIGHT TO LODGE A COMPLAINT WITH THE SUPERVISORY AUTHORITY**

You have the right to lodge a complaint with the Hellenic Data Protection Authority ([www.dpa.gr](http://www.dpa.gr)) on matters concerning the processing of your personal data.

## **8. LAST UPDATE**

This policy may be updated from time to time.  
*This current version is effective since 01/11/2025.*