



## INFORMATION

### On the Processing of Personal Data Via Video Surveillance System [CCTV]

<b>1. Data Controller</b>	The Company under the name «QUALITY ASSURANCE AND CONTROL SYSTEMS LTD» and the distinctive title « QACS», having its registered office at Metamorfosi, Antigonis Str. 1, PC: 14451, telephone 210-2934745 & e-mail: <a href="mailto:info@qacslab.com">info@qacslab.com</a> (hereinafter referred to as the “Company” or “QACS”).
<b>2. Video surveillance system description / description of camera operating areas / data description</b>	<p>Cameras have been placed at special entry/exit points (e.g. central entrance, equipment storage areas) and in special storage areas for crucial files, products and/or infrastructure of the Company, receiving image data only of persons entering its premises.</p> <p>Before entering an area covered by the video surveillance system, there are visible placards constituting the first level information provided to natural persons (employees, associates, volunteers and visitors in general).</p> <p>The video surveillance system is in continuous operation, i.e. twenty-four (24) hours a day, seven (7) days a week, while the personal data collected are facial image data. No audio or biometric data are processed.</p> <p>Face images concern any natural person (employees, associates, suppliers and other visitors), who enters the range of the cameras within the Company's facilities. It should be mentioned that the Company does not receive images from areas where, according to the person's expectations, video surveillance is not expected, such as w.c. etc.</p>
<b>3. Purpose of the processing and legal basis</b>	<p>The video surveillance system is used by our Company in order to protect our premises and the materials they include, its property, its employees and visitors, but also to ensure the quality and reliability of the tests it performs.</p> <p>The processing is carried out to protect our Company's legitimate interests, as defined in article 6 par. 1 f of the General Data Protection Regulation [EU 679/2016] in conjunction with law 4624/2019 and the Directive 1/2011 of the Hellenic Data Protection Authority and the guidelines 3/2019 of the European Data Protection Board.</p>
<b>4. Legitimate interest specification</b>	The legitimate interest of our Company consists of the need to protect our facilities, our offices and also its special area/testing laboratory, digital and other infrastructure and material within them [for example: equipment, samples to be processed, etc.] from illegal acts, such as theft, vandalism, damage, sabotage. Our legitimate interest also includes life safety, physical integrity, health and property of our staff and visitors who enter the monitored area, which QACS takes care of with a special sense of responsibility and respect. We only collect image data and limit surveillance to areas where there is proven increased likelihood of illegal acts being committed e.g. at entry areas, without focusing on areas where privacy of the persons whose image is taken may be unduly restricted, including their right to protection of their personal data.
<b>5. Recipients of personal data</b>	A specific procedure is followed for accessing the video surveillance material. Only certain competent and authorized personnel of the Company who are bound by confidentiality and privacy clauses have access to the video

	<p>surveillance material. The IT Department of QACS are in charge of the management of the material and access to it.</p> <p>The files are not transferred to third persons. The files are transferred only in exceptional circumstances and where necessary:</p> <ol style="list-style-type: none"> <li>1. to the competent judicial, prosecutorial and police authorities when it includes information necessary for the investigation of a criminal act, which concerns persons or our goods,</li> <li>2. to the competent judicial, prosecutorial and police authorities when they request data in the exercise of their duties,</li> <li>3. to the victim or the perpetrator of a criminal act, when it comes to data that may constitute evidence of the act, respecting the protection of the personal data of other persons to the extent possible.</li> </ol>
<p><b>6. Data storage period</b></p>	<p>We retain the data for a period of up to fifteen (15) days, after which they are automatically and securely and irretrievably deleted. In the event that an incident is detected during this period, QACS isolates part of the video and keeps it for a period of up to one (1) more month, in order to investigate the incident and initiate legal proceedings to defend its legitimate interests, while if the incident concerns a third party, the video is kept for up to three (3) more months. The material is further kept for as long as necessary on a case-by-case basis to support or refute any legal claims.</p>
<p><b>7. Technical and Organizational Measures</b></p>	<p>QACS implements appropriate technical and organizational measures for the security of the personal data of the natural persons it processes in the context of its activities on a case-by-case basis and in particular of the data collected through the video surveillance system in its facilities. In particular, techniques are applied to increase network security, limited access, safeguard availability, physical security, which as a whole contribute to maintaining the confidentiality, availability and integrity of the personal data of the natural persons it processes. A Data Protection Officer (DPO) has been appointed and secure data transfer procedures are in place in the event of a request. Any copies are provided with remaining faces blurred to minimize data.</p>
<p><b>8. Data Subjects' Rights</b></p>	<p>Regarding the video surveillance system material, data subjects retain their rights, arising from articles 12-22 GDPR, the provisions of Law 4624/2019 and in accordance with the specific conditions, to the extent that they apply to video surveillance material. In particular:</p> <p>a/ Right of access, i.e. to find out if QACS is processing their image and, if this is the case, to receive a copy of it, after taking appropriate measures on a case-by-case basis so that the rights of other persons who appear in the material are not affected.</p> <p>b/ Right to restriction, i.e. to request that the processing in question be restricted, such as for example not to delete during the prescribed time data which they consider necessary for the establishment, exercise or support of legal claims, without however QACS carrying out any other type of processing.</p> <p>c/ Right to object, i.e. objection to the processing.</p> <p>d/ Right to erasure, i.e. to request the deletion of the relevant data, subject to the provisions of the GDPR and Law 4624/2019. It should be clarified that this right is subject to certain conditions and to the obligations, interests and any legal claims of the company regarding the maintenance of the data, based on the applicable legislative and regulatory provisions.</p> <p>It should be pointed out that the exercise of the right to object or delete does</p>

	<p>not imply the immediate deletion of data or modification of the processing.</p> <p>In the event that a person considers that the processing of his/her personal data violates Regulation (EU) 2016/679, Law 4624/2019 and in general the applicable legislative and regulatory framework regarding the protection of personal data, he/she also has the right to lodge a complaint with a supervisory authority. The competent supervisory authority in Greece is the Personal Data Protection Authority (<a href="https://www.dpa.gr/">https://www.dpa.gr/</a>), Kifisias Avenue 1-3, 11523, Athens, telephone 2106475600, e-mail <a href="mailto:contact@dpa.gr">contact@dpa.gr</a>.</p>
<p><b>9.Way of exercising rights</b></p>	<p>Data subjects' rights may be exercised as follows:</p> <ul style="list-style-type: none"> <li>✓ by submitting a relevant written request and in particular by submitting a relevant electronic request/ an email to the following email address <a href="mailto:dpo@qacs.gr">dpo@qacs.gr</a> or</li> <li>✓ by sending a letter to the attention of the Data Protection Officer (DPO) of QACS at the postal address of the Company [Metamorfofi Attikis (Antigonis, 1, 14451) in order to further assist the data subject.</li> </ul> <p>The applicant shall:</p> <p>a) either specify the period of time during which he/she was in the range of the cameras, providing a photo, in order to facilitate the detection of the requested data and the concealment of the data of third parties depicted, or</p> <p>b) come in person to the Company's premises, so that the images in which he/she appears can be shown to him/her.</p> <p>QACS will make every effort to carry out the required actions and satisfy your request within one month of receipt of the respective request, unless the tasks related to its satisfaction are characterized by particularities and/or complexities based on which the Company reserves the right to extend the time for completing its actions. In any case, our Company will inform the data subject about the progress of the request within one (1) month of its submission.</p>
<p><b>10. Update of this Policy</b></p>	<p>QACS reserves the right to update this Policy at any time. The security measures taken by the Company are constant and are based on case-by-case decisions in accordance with the principles of processing as defined by GDPR and Law 4624/2019, the guidelines of the competent supervisory authorities, upon weighing, on the one hand, the risk and probability of the occurrence of that risk in the privacy of persons and on the other, the legitimate interests of the Controller.</p> <p>To this end, please check this Policy regularly in order to be informed of the changes that have been made.</p>