

Data protection notice about video surveillance

We would hereby like to notify you about how MedNet Greece processes personal data collected from our video surveillance at our headquarters in Athens Greece (3, Pergamou str. Nea Smirni), in cases where it may be possible for us to identify individual people in the recordings.

Who is responsible for processing the data, and how can you contact our Data Protection Officer?

The party responsible for processing your data is **MedNet Greece Commercial Services Societe Anonyme**, 3, Pergamou str, 17121 Nea Smirni, Athens, Tel.: +30 2109307900, Fax: +30 210 9307601, info@mednet.com.gr. If you have any questions about this notice and how we process your personal data, you can also contact our **Data Protection Officer** at dpo@mednet.com.gr.

For what purposes, and on what legal basis, will your data be processed?

We process all personal data in compliance with the EU General Data Protection Regulation (GDPR), and all other applicable national laws and regulations (including Directive 1/2011 of the Greek Data Protection Authority on the “*Use of video surveillance systems for the protection of individuals, and assets*”).

We use video surveillance for the purposes of our legitimate interests [Art. 6(1)(f) of the GDPR], in guaranteeing that the necessarily high security standards be met. The Company is responsible for the safety of our staff, and for the security of our office buildings and the material assets within them.

Our video surveillance serves to protect our building, assets and people. Consequently, the recordings may also be used to investigate any offences (e.g. break-ins or wilful property damage).

Where do we use video surveillance and how does the system operate?

We have installed cameras aiming at the parking space right in front of the main entrance of our office buildings, inside the ground floor of the building aiming at the entrance door and the elevator, on the southeastern side of the building aiming at the basement garage gate and at the back yard of the building aiming at the back door of the ground floor. We exclusively use immovable cameras installed at fixed angles, with no sound recording. We use appropriate measures – i.e. signage – to identify our cameras. The cameras operate on a 24/7 basis. Recordings are transmitted to the external system operator (see below).

Who has access to your data?

The cameras have been installed and are managed by an external specialized provider, Netizen Security S.A. [Ethnikis Antistaseos 181, Drapetsona, Piraeus, P.C. 18648, E: info@netizensecurity.gr, Call Center: +30210 408 28 04, Fax: +30 210 408 28 06]. Access to our camera recordings is restricted to only very few staff members in our IT department.

Further to that, the recordings are not transmitted to third parties, except in the following cases: a) to the competent judicial, prosecutorial and police authorities when the recordings include information necessary to investigate a criminal act involving natural persons or goods of our company; b) to competent judicial, prosecutorial and police authorities, that legally request the data in performing their duties; and c) to the victim or perpetrator of a criminal act, in the case of data which may constitute evidence of such act.

How long will we store your data?

We keep the recordings for seven (7) days, after which they are automatically deleted. In case we become aware of an incident during this period, we isolate part of the video and keep it for up to one (1) additional month, in order to investigate the incident and initiate legal proceedings to defend our legal interests, whilst if the incident concerns third parties, we will keep the video for up to three (3) additional months.. If there is a legitimate reason for further retaining recordings or in the event we are requested to forward them to the police or other authorities, we shall take all necessary steps to ensure compliance with applicable laws.

What data protection rights do you have as a data subject?

- Right to access your personal data: You have the right to be informed on whether we process your image and, if so, to receive a copy thereof.

- Right to restrict the processing of your personal data: You may request from us to restrict the processing of your personal data, such as not to delete those data that you deem necessary in order to establish, exercise or support legal claims.
- Right to object to the processing of your personal data: Due to the fact that we process your data for the purposes of protecting legitimate interests, you may object to this processing on grounds relating to your particular situation. We will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or if the processing serves the assertion, exercise or defense of legal claims.
- Right to erase your information / right to be forgotten: You may request from us to delete your Personal Data.

Please use dpo@mednet.com gr to exercise these rights or our mail address to the attention of our Data Protection Officer.

In order to assess your request, you need to let us know when you were in the cameras' range and provide us with a picture of yours to help us locate your own data and cover the data of third parties. Alternatively, you may visit our facilities so that we show you any images in which you appear. We also need to point out that the exercise of the right of objection or erasure will not result to the immediate deletion of data or to the modification of the processing activity, which is subject to the prior processing of the request and its acceptance where the applicable legal requirements are met. In any case, we will respond to you in detail as soon as possible, within the deadlines set by the European Regulation (EU) 2016/679 (GDPR).

Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with a supervisory authority if you consider that the processing of your personal data infringes the Regulation (EU) 2016/679.

Competent authority in Greece is the Hellenic Data Protection Authority
(Contact details)

Address: Kifisias 1-3, Athens, Greece, Postal Code: 115 23

Phone number: 210 6475600,

Email: contact@dpa.gr

Website: www.dpa.gr ⇒ Citizen Rights ⇒ Complaint to the Hellenic DPA