

### NOTICE ON THE OPERATION AND USE OF THE CCTV SYSTEM

#### 1. Introduction

CNP CYPRUS INSURANCE HOLDINGS LIMITED operates a Closed-Circuit Video Surveillance System (hereinafter the "CCTV") at its premises, as well as in other affiliated companies of CNP Group.

The CCTV system is a surveillance system which utilizes images for signal transmission through the use of special camera devices (hereinafter the "cameras").

The cameras record images that can identify natural persons, either directly or indirectly, by capturing, for example, facial features or vehicle registration numbers. These data are considered personal data and their recording constitutes personal data processing.

CNP CYPRUS INSURANCE HOLDINGS LIMITED (hereinafter "CNP") is the Data Controller for the collection and processing of personal data through the CCTV.

CNP is committed under applicable law to ensure and safeguard the right to the protection of personal data and to protect the personal data it collects and maintains through the CCTV system.

The NOTICE ON THE OPERATION AND USE OF THE CCTV SYSTEM (hereinafter the "CCTV Notice") is addressed to the natural persons who work or visit the premises of the CNP Group companies in order to inform them about the use and operation of the CCTV through which personal data is collected and processed for specific and defined purposes.

## 2. Purpose of the CCTV

The operation of the CCTV is necessary for the following purposes:

- To ensure and protect the safety and health of the employees of the CNP group companies and other persons visiting the premises of CNP Group Companies.
- To prevent, investigate and detect criminal offences or incidents endangering the security at the premises of the CNP group companies.
- To protect the property and other assets of the CNP Group companies, such as equipment, critical information, building facilities and infrastructure.
- To protect the assets of the employees and other persons visiting the premises of the CNP group companies.

## 3. Legal basis for processing

The operation and use of the CCTV is carried out in accordance with the General Data Protection Regulation (EU 2016/679) (hereinafter "GDPR") and the Law providing for the



Protection of Natural Persons with regard to the Processing of Personal Data and the Free Movement of such Data of 2018 (Law 125(I)/2018), as amended from time to time (hereinafter collectively referred to as the "Data Protection Laws").

The use of the CCTV system safeguards the legitimate interests of CNP and the other affiliated companies of the CNP Group as defined below:

- I. To ensure and protect the safety and health of the employees of the CNP group companies and other persons visiting its premises.
- II. To prevent, investigate and detect criminal offences or incidents endangering the security at the premises of the CNP group companies.
- III. To protect the property and other assets of the CNP Group companies, such as equipment, critical information, building facilities and infrastructure.
- IV. To protect the assets of the employees and other persons visiting the premises of the CNP group companies.

Video surveillance areas cover indoor and outdoor areas of the CNP Group companies' facilities. The coverage of the CCTV system is limited to the spaces strictly necessary in relation to the intended purposes.

No sound recording is performed using the CCTV system.

Relevant warning signs have been placed in the areas covered by the CCTV system, which constitute the first level of information on the operation of the system in accordance with the Data Protection Laws.

## 4. Storage and Preservation

The recorded material will not be retained for longer than necessary, taking into account the purposes of collection and processing.

In the case of incidents which may require internal examination and/or evaluation or are required by competent authorities or in the context of judicial proceedings, the retention period shall be extended to a period considered reasonable taking into account the purpose of the retention and processing.

# 5. Security and Protection of Personal Data

Appropriate legal, organizational and technical measures are taken to protect the personal data collected through the CCTV system. A number of security technologies, techniques and procedures are implemented to protect the personal data from unauthorized access and disclosure, loss, use or modification. The machinery and equipment of the CCTV system are installed in special areas of controlled and classified access. The authorised



people who have access to the CCTV system are trained and informed of the purpose of the processing, the permitted uses of the CCTV system and the protection measures of the systems.

#### 6. Access and recipients

Access to the CCTV system is strictly limited to authorised persons only for the purposes of system operation and/or maintenance or incident investigation. In some cases, personal data may be disclosed to third parties such as police authorities or other competent authorities.

The disclosure or transmission of personal data to third parties, except where there is a legal or regulatory obligation, will only take place when the recipient of the information has entered into a contract with CNP under which they agree to maintain the confidentiality of your information and to take all necessary technical and organizational measures to protect the information from risks.

### 7. Rights of Natural Persons

Subject to any restrictions imposed by Data Protection Laws or other applicable laws on a case-by-case basis, any natural person whose personal data is collected through the CCTV retains the following rights regarding the personal data concerning her/him.

**Right of access to** personal data, and right to obtain a copy. A copy of the data is usually free of charge and can be given on paper or electronically.

**Right to rectification of** personal data to the extent technically feasible, taking into account the fact of collecting personal data through the CCTV.

**Right to erasure** of personal data collected through the CCTV. It is noted that there are cases, however, in which due to a legal or regulatory obligations it will not be possible to delete the data.

**Right to restrict the processing** of personal data in certain cases, including when the data is no longer necessary for the purpose of processing but is requested to be retained for the purposes of legal claims or when the right to object is exercised.

**Right to object to the processing** of personal data. In the event that such a request is submitted to exercise the right to object, the processing will be terminated unless CNP is able to demonstrate an overriding legitimate interest or if the data is necessary due to legal obligations or to support legal claims.

**Right to portability** of personal data. Under certain conditions, following a specific request, personal data may be transferred from CNP to another organization in a readable, structured and commonly used format.



**Right to lodge a complaint**. Any natural person may lodge a complaint with the Commissioner for Personal Data Protection in the event of a complaint regarding the processing of personal data.

The exercise of the above rights is free of charge, unless the requests are manifestly unfounded or excessive, in particular due to their repetitive nature.

To exercise any of your rights, or to obtain more information about the CCTV system, please contact the CNP Group Data Protection Officer.

Address: 17 Akropoleos Street Strovolos 2006 Nicosia, P.O. Box 25218

Ηλεκτρονική διεύθυνση: dpo@cnpcyprus.com

## 8. Changes to the Policy

This CCTV Notice may be amended from time to time, in order to reflect any changes in legislation or technological developments or on the basis of CNP Group's business needs.

Relevant updates for modifications will be made through CNP Group's applications and websites.

Last updated: 08 11 2024