

# CCTV Privacy Statement

## 1. Data Controller

ELVAL, the Aluminium Rolling Division of ElvalHalcor S.A., situated on 61st km Athens – Lamia National Road, at Oinofyta, Voiotia, controls your personal data, explicitly for the agreed purposes.

## 2. Purpose of Processing and Legal Basis

ELVAL uses a CCTV (surveillance) system for the protection of persons and property in the controller's areas including Health & Safety reasons. The legal basis for this processing is the legitimate interest of the company.

## 3. Legitimate Interest Analysis

Data processing is required to prevent and detect infringements and potential crimes, catch perpetrators in the act, collect evidence for such infringements, as well as to investigate the circumstances of accidents that may occur and to ensure that health and safety procedures are followed. We collect only image data from specific areas that have been previously assessed as areas with increased likelihood of either illegal actions or health & safety incident without focusing on spots where individuals' privacy might be excessively restricted.

## 4. Data Recipients

Data collected and processed through CCTV systems is accessible only by our authorized staff in charge of ELVAL physical security. This data is not shared or transferred to any third party exempt in the following cases:

- a) To the competent judicial, prosecutorial and police authorities when it includes information necessary for the investigation of a criminal act which concerns persons or goods of the controller,
- b) To competent judicial, prosecutorial and police authorities when requesting data, legally, in the performance of their duties, and
- c) To the victim or perpetrator of a criminal act, in the case of data which may constitute evidence of the act.

## 5. Data Retention

We retain the data for fifteen (15) days, after which they are automatically deleted. In case we find an incident during this period, we isolate part of the video and keep it for up to one (1) more month, in order to investigate the incident and initiate legal proceedings to defend our legal interests, while if the incident concerns third parties, we will keep the video for up to three (3) more months.

## 6. Your rights as Data Subjects

Please be informed that you have the following rights:

- Right of access: you have the right to know if we are editing your image and, if so, to obtain a copy.
- Right to Restriction of processing: you have the right to ask us to restrict the processing, such as not deleting data that you deem necessary to establish, exercise or support legal claims.
- Right to object: you have the right to object to the processing.
- Right to Erasure: you have the right to request that we delete your data.

You can exercise your rights by sending an e-mail to [privacy@elval.com](mailto:privacy@elval.com) or by letter to our postal address or by submitting the request to us in person at ELVAL address. In order to examine a data subject request related to your image, you need to determine the date or the range of dates that have visited our areas and provide us with a picture of you to make it easier for us to identify and locate your data and hide the data of rest individuals within the video. Alternatively, we give you the opportunity to visit our facilities to show you the images in which you appear. We also point out that the exercise of the right to object or delete does not imply the immediate deletion of data or the modification of the processing. In any case, we will respond to you in detail as soon as possible, within the deadlines set by the GDPR.

In the case where you believe that we do not process your personal data lawfully or we have not sufficiently addressed your rights as above, you are entitled to complain so to the Supervisory Authority of the country of your residence or of ELVAL. The details of the Supervisory Authority for ELVAL are:

Web: [www.dpa.gr](http://www.dpa.gr)

Email: [contact@dpa.gr](mailto:contact@dpa.gr)