ELLAKTOR S.A
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VAT Registration No.: 094004914, Tax Office: KEFODE ATTIKIS,
General Commercial Registry (G.E.MI.) No.: 000251501000

NOTICE ON THE PROCESSING OF PERSONAL DATA THROUGH VIDEO SURVEILLANCE SYSTEMS AT THE PREMISES OF THE ELLAKTOR GROUP

This notice provides information regarding the processing of data through video surveillance (CCTV) systems installed at the facilities of the ELLAKTOR Group.

The Group places great importance on the protection of personal data and ensures transparency in its processing. As Data Controllers, the Group's companies comply with the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 - GDPR) and with Greek Law 4624/2019, as applicable.

The surveillance systems are installed at the Group's headquarters and the respective premises of its affiliated companies. More information about the companies that comprise the Group is available at: www.ellaktor.com

1. Purpose of Processing

The Group's companies use CCTV systems for the purpose of protecting individuals entering and/or working on their premises, as well as safeguarding the facilities and the assets located therein.

2. Legal Basis for Processing

This processing is necessary for the purposes of legitimate interests pursued by us as Data Controllers (Article 6(1)(f) of the GDPR). Our legitimate interest lies in the need to protect our premises, and the goods located within them from illegal activities, such as theft. This also applies to the protection of life, physical integrity, health, and property of our staff and third parties who are lawfully present on the monitored premises.

Only image data is collected (no audio), and surveillance is limited to areas with a higher likelihood of unlawful activity (e.g., cash registers, building entrances). Surveillance avoids spaces where privacy would be disproportionately affected, in line with the principles of necessity, data minimization, and the reasonable expectations of data subjects.

Specifically, image recording is carried out with the following considerations:

- No data processing occurs from images captured from adjacent streets or sidewalks, nor from the entrances or interiors of neighboring residences or buildings.
- Surveillance is not used to monitor employees in their workplaces. Exceptions may apply only where justified by the nature and conditions of the work, and only for purposes such as health and safety or the protection of critical areas.
- In typical office environments, video surveillance is limited to entry and exit points, not individual offices or meeting rooms. Exceptions include specific areas such as cash handling areas, vaults, or technical facilities, provided that the cameras focus on the goods being protected and not on the employees' spaces. Furthermore, it is emphasized that, in any case, the data collected cannot be used as criteria for evaluating the behavior or performance of employees.

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3. Data Retention Period

Footage is retained for fifteen (15) days, after which it is automatically deleted. In the event of an incident (e.g., theft, robbery, accident), footage is retained in a separate file for up to one (1) additional month, for the purpose of investigating the incident and initiating legal proceedings to protect the legitimate interests of the Data Controllers. If a third party is involved, the footage may be retained for up to three (3) additional months.

4. Recipients of the Data

Processing takes place exclusively within Greece. Footage is accessible only by authorized personnel of the Data Controller and external security partners acting as Data Processors, bound by confidentiality and processing data only according to the Controller's instructions.

This footage is not shared with third parties, except in the following cases: a) to the competent judicial, prosecutorial, and police authorities when it contains elements necessary for the investigation of a criminal offense concerning persons or property of the Data Controller, b) to the competent judicial, prosecutorial, and police authorities when data is lawfully requested in the course of their duties, c) to the victim or perpetrator of a criminal offense, when the data may serve as evidence of the offense.

5. Confidentiality and Security of Processing

The Group's Companies and all parties processing data on their behalf are committed to maintaining the confidentiality and security of data processing. In particular, they take appropriate technical and organizational measures to prevent unauthorized access, alteration, or misuse throughout the data retention period.

6. Data Subjects' Rights

- Right of Access: You have the right to receive a copy of the video footage in which you appear. The Data Controller will provide a copy of the portion of the video recording where the data subject is captured, or alternatively a printed series of snapshots from the recorded footage. If not captured, or if the footage has been deleted, the data subject will be informed accordingly in writing within the same timeframe.
- Right to Restrict Processing: You have the right to request that we restrict processing - for example, by asking us not to delete data you consider necessary for the establishment, exercise, or defense of legal claims.
- Right to Object: You have the right to object to the processing.
- Right to Erasure: You have the right to request the deletion of your data.

You may exercise your rights by sending an email at dpo@ellaktor.com, mailing a letter to the postal address of the Data Controller, or submitting your request in person. To process a request involving your image, please indicate the approximate time you were in the monitored area and provide a photo of yourself to help identify your data and anonymize other individuals. Alternatively, you may visit our premises to view the footage. Please note that exercising the right to object or erasure does not automatically mean the data will be deleted or processing modified. Each request is assessed individually, and you will receive a response as soon as possible and always within the deadlines set by the GDPR.

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If, after exercising your rights, you are unsatisfied with our response, you have the right to lodge a complaint with the Hellenic Data Protection Authority, Kifisias 1-3, 115 23 Athens, https://www.dpa.gr, tel. 210 6475600, via its online portal: https://eservices.dpa.gr.