

Notice regarding the processing of personal data through video surveillance

1. Data Controller:

The Data Controller of your personal data is TITAN CEMENT COMPANY SA (22^A Halkidos Street, Athens 11143, Greece).

2. Purpose of processing and legal basis:

We are using video surveillance (CCTV) for the protection of individuals and goods in our premises. The processing is necessary for the purposes of our legitimate interests as data controller (GDPR, article 6, para. 1. f).

3. Analysis of legitimate interests:

Our legitimate interest consists of the need to protect our premises and the goods in our premises from illegal acts, such as, indicatively, theft, destruction. This is also the case with regard to the safety of the life and limb, the health as well as the property of our staff and third parties, who are legitimately present in the monitored area. We collect only visual data and restrict the monitoring to areas where the illegal conduct is more likely to occur based on our assessment, such as the entrances to our facilities, without focusing on areas which might present an excessive restriction of the private life of individuals, whose image is captured by the camera, including their right to respect their personal data.

4. Recipients and Protective Measures:

The material we collect is stored by us and is accessible only to the authorized security staff of our premises. This material is not transferred to third parties, except under the following circumstances: a) to authorized judicial, prosecutorial and law enforcement authorities, when the material contains information which is essential for the investigation of a criminal act relating to individuals or goods, b) to authorized judicial, prosecutorial and law enforcement authorities, when they legally request the data in the course of exercising their duties, and c) to the victim or perpetrator of a criminal act, when the data may serve as evidence for that act. We implement the appropriate technical and organizational measures to protect the stored material from any loss, misuse, unauthorized access, disclosure, alteration and destruction.

5. Retention time:

We maintain the data for fifteen (15) days, after which time they are deleted automatically. In case we identify an incident during that period of time, we will separate the relevant footage and store it for an additional period of up to one (1) month, in order that the incident be properly investigated and legal action for the protection of our legitimate interests commence. If the incident concerns a third party, we will store the footage for an additional period of up to three (3) months.

6. Rights of data subjects:

Data subjects have the following rights:

- a) **Right of Access:** You have the right to be notified by us whether we process your image, and if this is the case, to obtain a copy.
- β) **Right to Restriction:** You have the right to request from us to restrict the processing (e.g. not to delete the data which you consider necessary to establish, exercise or defend any legal action), if you contest their accuracy, the processing is illegal or no longer necessary or you have exercised your right to object.
- γ) **Right to Object:** You have the right to object to the processing. If you exercise such right, we will cease processing your personal data, unless we demonstrate compelling legitimate grounds to continue processing your personal data or to establish, exercise or defend legal claims.
- δ) **Right to Erasure:** You have the right to request from us the erase your personal data, if among other things, their processing is no longer necessary or legitimate.

You may exercise your rights by sending us an email at dataprotection@titan-cement.com or a letter to our headquarters at 22^A, Halkidos Street, Athens 11143, Greece. To examine your request relating to your image we will need you to indicate about when you were present in our premises and send us your picture, so as to facilitate us to identify your data and hide the data of other individuals appearing in the footage. Alternatively, you may come to our premises and we will show the footage in which you appear. Note that the exercise of your right to object or your right to erasure does not necessarily entail the immediate deletion of data or a change in the processing. In any event, we will respond to you in detail as soon as possible within the deadlines set by the GDPR.

7. Right to file a Complaint:

If you consider that the processing of your data violates Regulation (EU) 2016/679 (GDPR), you have the right to file a complaint to the regulator. The regulator in Greece is the Data Protection Authority, 1-3 Kifisias Avenue, Athens 115 23, Greece, <https://www.dpa.gr/>, tel. +30 210 6475600.