

**Information on processing of personal data through  
video devices**

**1. Data Controller:**

The company under corporate name “NEXI PAYMENTS GREECE SOCIETE ANONYME”, which is headquartered at 15 Charilaou Trikoupi Street, 10678, Athens, Attica, with GCR No. 161553201000 (hereinafter the “Company”). It is controlled and is a subsidiary of Nexi S.p.A, which is headquartered at Corso Sempione 55, 20149, Milan, Italy.

As a data controller, the company has all the obligations that arise from GDPR 2016/679, Law 4624/2019 and the Hellenic Data Protection Authority (HDPa).

**2. Purpose of processing and legal basis:**

We use a surveillance system for the security and protection of our personnel, visitors, office areas and other assets belonging to the Company. Processing is necessary for the purposes of the legitimate interests pursued by the controller (Article 6 par. 1. f of the GDPR).

**3. Analysis of legal interests**

Our legal interest is in our need to protect our premises and the goods therein from illegal acts, such as theft. The same applies to the safety of life, physical integrity, health, as well as the property of our staff and third parties who are legally in the supervised area. We only collect image data and limit video footage to areas we have assessed as having an increased likelihood of illegal acts being committed e.g. theft, such as the entry to our premises, without focusing on areas where the privacy of the persons whose image may be taken may be excessively restricted, including their right to respect their personal data.

The processing of data through a video surveillance system has been restricted to the absolutely necessary personal data in order to meet the purpose of the processing. The surveillance system was installed by a professional in appropriate locations to ensure that monitoring is restricted to the absolutely necessary areas in relation to its intended purposes. Road or footpath facing cameras have not been installed; thus, there is no footage of the exterior public area or neighbouring buildings.

The operation of the cameras on working and non-working days/hours ensures increased protection of the Company’s employees, premises and resources such e.g., prevention and proof of a criminal acts being committed (theft, vandalism, etc.), containment of flood or fire before it spreads, etc., particularly during the night and holidays when the risk is higher.

**4. Recipients**

The data is only accessible from the competent/authorized staff in charge of the safety of the premises and in particular the company doing business as “ALPHA ASTIKA AKINITA”, which is in charge of the security and guarding of the Company’s premises.

This data is not be transmitted to third parties, except in the following cases: a) to the competent judicial, prosecutorial and police authorities when it includes information necessary to investigate a criminal act involving persons or goods of the controller, b) to the competent judicial, prosecutorial and police authorities when requesting data, legally, in the context of exercising 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. Retention period**

We keep your data for fourteen (14) days, after which time they are automatically deleted. If an incident takes place during this period, we will isolate part of the video and keep it for an additional one (1) month, in order to investigate the incident and initiate legal proceedings to defend our legal interests; however, if the incident concerns any third party, we will keep the video for an additional three (3) months.

## **6. Rights of data subjects**

Data subjects have the following rights:

- Right of access: you have the right to be informed if we process your image and, if applicable, receive a copy.
- Right to restriction: you have the right to ask us to restrict processing, such as not deleting personal data that you consider as necessary to establish, exercise or support legal claims.
- Right to objection: you have the right to object to the processing of your personal data.
- Right to erasure: you have the right to ask us to delete your personal data.

You can exercise your rights by sending an e-mail to [npgr.dpo@nexigroup.com](mailto:npgr.dpo@nexigroup.com) or a letter to the postal address 15 Charilaou Trikoupi Street, 10678 Athens or by submitting the request to us in person. In order for us to look into a request related to your image, you need to inform us when you were in the range of the cameras and give us a picture of you to make it easier for us to identify your data and hide the data of third parties. Alternatively, we give you the opportunity to visit our facilities to show you the relevant images that you appear in. In addition, please note that the exercise of the right to object or delete your personal data, does not imply the immediate deletion of data or the amendment of the processing. In any case, we will respond to you in detail as soon as possible, within the deadlines set by the GDPR.

## **7. Right to lodge a complaint**

If you believe that the processing of your data breach Regulation (EU) 2016/679, you have the right to lodge a complaint with the supervisory authority.

In Greece, the supervisory authority is the Hellenic Data Protection Authority, 1-3 Kifissias Avenue, 115 23, Athens, <https://www.dpa.gr/>, tel. 2106475600.

## **8. Update Review**

The Company intends to periodically review this document in order to reflect the changes in policies and practices.

**DATE OF LAST UPDATE 19/07/2022**