

Second Level Notice
on the processing of personal data through the Closed Circuit Television System (CCTV)

1. Controller

1.1 Our company with the name “**ATTIKOS HOTEL - TOURISM - COMMERCIAL AND SHIPPING SOCIETE ANONYME**” and the distinctive title “**ATTIKOS ILIOS S.A..**” (hereinafter as the “**Company**”) seated in Athens, 19 Amerikis Street, P.C. 10672 with V.A.T. 094542870 and GEMI registration number 003190901000 uses your Personal Data with due diligence. Our Company is the Data Controller for the processing of your Personal Data, which it collects and processes through the Closed Circuit Television System (CCTV) that it has installed in its premises where there is appropriate signage.

1.2. For any concerns, questions or complaints you may have regarding the processing of your Personal Data, you may contact our Company as follows:

- By phone at 2103679000
- By sending us an e-mail at dpo@grandresort.gr
- By letter to our address 19, Amerikis Street, Athens, P.C. 10672.

2. Purpose of processing and legal basis

2.1 Our Company has installed the CCTV System for the following legal and defined processing purposes according to the groups of cameras installed in the premises of the Grand Resort Lagonissi Hotel for the purpose of protection of persons and property. More specifically, the cameras have been installed.

A) Around the perimeter of the hotel for the surveillance and prevention of unauthorized entry, for the protection of its employees and the guests and associates of our Company, as well as for the protection of assets from theft, arson or other illegal activity.

B) In the main parking area of the hotel to protect the vehicles of our Company's guests, visitors and employees and any attacks against natural persons.

C) In the areas of our hotel's supply transport elevators, which are deemed to require special protection, without being focused on the persons of employees.

2.2 The processing is necessary for the **legitimate interests** pursued by us as Data Controller (Article 6(1f) of the GDPR) for the **protection of persons and property** on our Company's premises, which we have fairly balanced with your privacy and the result of the balancing does not infringe your fundamental rights and freedoms.

3. Analysis of legitimate interests

3.1 Personal Image and Video Data are processed through the cameras of the CCTV System, which meets the legal requirements for its installation and is appropriately marked, based on the legitimate interest of our Company:

A) to protect and safeguard the physical integrity of people lawfully entering, passing through or being in the supervised areas of the Grand Resort Lagonissi premises through the CCTV System from dangerous attacks against their physical integrity.

B) to protect the premises, customers' and the Company's property located therein from unlawful acts, such as theft or arson.

3.2 We collect and process your Personal Image and Video Data through the CCTV System cameras, which do not collect sound from their installation areas nor do they have visual focus capability and the image collection is not used for the evaluation of our employees.

3.3 The places where the cameras are installed are places where it has been assessed that there is an increased likelihood of unlawful acts being committed, and we do not focus on places where the privacy of the persons whose image is taken may be unduly restricted, including their right to respect for Personal Data. The CCTV System in question has only been installed in specific places where it is absolutely

necessary to take measures to protect them. Certainly, no image data are collected from places where data subjects have a high expectation of privacy (e.g. toilet rooms and lobbies).

3.4 Our Company has prepared a DPIA for the processing of your Personal Image and Video Data during the installation and use of the CCTV System, in accordance with Article 35 of the GDPR, taking into account the nature, scope, context and purposes of their processing, which is available to you after your request to the contact details of the Company's Data Protection Officer, as shown in section 1.2 above.

4. Security of our company's systems

4.1 Grand Resort Lagonissi implements appropriate technical and organizational measures and strict security procedures to protect the Personal Image and Video Data it collects and processes from unauthorized disclosure, use, alteration or destruction.

4.2 The recording devices along with the cameras of the CCTV System are connected to the Company's internal network, which is protected from unauthorized access by the use of passwords. Access to the CCTV System and your Personal Image and Video Data is not available to third parties including real-time images and recorded material, but only to a small number of qualified and specially designated employees in our Company and with the use of special passwords.

5. Recipients

5.1. Our Company does not transfer your Personal Data of your image and video to third companies but limits the disclosure to recipients, observing the procedures required by law: a) to the competent judicial, prosecutorial and police authorities when they include data necessary for the investigation of a criminal act, which concerns persons or property of our Company, b) to the competent judicial, prosecutorial and police authorities when they request data, legally, in the exercise of their duties, and (c) to the victim or perpetrator of a criminal offence, where the data concerned may constitute evidence of the offence.

5.2 In addition, your Personal Data are not transferred to third countries but are stored locally in our Company's systems.

6. Retention period

6.1. Our Company collects your Personal Data through the use of fixed cameras and recording systems that operate twenty-four (24) hours a day, seven (7) days a week.

6.2 Our Company retains your Personal Image and Video Data in a secure file **for fourteen (14) days in addition to the day of collection of the data**, after which they are deleted by automated methods.

6.3 In the event that during this period of time an incident against the protection of persons or property of our Company is detected, after informing the specialized personnel, we isolate part of the video and keep it for **one (1) month** more, in order to investigate the incident and initiate legal proceedings to defend our legitimate interests. In the event that we are informed that the incident involves a third-party perpetrator or victim, other than our Company, we will retain your Personal Image and Video Data for **three (3) months** in order to investigate and defend or rebut your legal rights.

7. Notices to data subjects about video surveillance

In addition to the present, our Company provides appropriate general information to you about the processing of your Personal Data through the installation and use of CCTV system, in the following means:

- Through the appropriate signage placed at the places where cameras are installed bearing a QR code that redirects to this notice
- Through the text of the Grand Resort Lagonissi Customer Privacy Policy published on its website
- In particular, the employees of the Company are informed through the Privacy Policy of Employees.

8. Your Rights

When processing Personal Image and Video Data when using the CCTV System, you have the following rights:

- **Right of access:** you have the right to be informed whether we are processing your data and, if so, to receive a copy of them.
- **Right of restriction:** you have the right to ask us to restrict the processing of your data in question when the processing is no longer necessary for the purposes for which they were collected but you need to keep data that you consider necessary for the establishment, exercise or support of legal claims and when you have exercised your right to object until our Company has decided on the balance of its legitimate interest with your privacy.
- **Right to object:** you have the right to object to the processing of your Personal Data. If you exercise your right to object, our Company will reassess its legitimate interest by demonstrating compelling and legitimate reasons that are fairly balanced with your privacy.
- **Right to erasure:** you have the right to request that we delete your data when they are no longer needed for the purposes for which they were collected and when you object to their processing. Our Company reserves the right to refuse to exercise the above right if the processing of the data is necessary: a) for the purpose for which it was collected; b) to comply with a legal obligation; c) to establish, exercise or defend legal claims.

Procedure for exercising your rights

You can exercise your rights by sending your request to our contact details as set out in section 1.2 above.
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You will need to know and identify when you were within the range of the cameras installed at Grand Resort Lagonissi, as well as provide us with an image of you and additional identification data in order to help us to locate your video and image and to carry out techniques that will not identify third parties in your Video and Image.
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Please note that exercising the right to object or delete does not imply the immediate deletion of data, but will be checked each time. In any case, you will be asked to provide us with a copy of your video and image.

For this reason, we invite you to contact us in a timely manner in case an incident occurs against you or against your assets.
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9. Right to complain/Alternative Dispute Resolution

9.1 You have the right to submit a complaint or lodge your complaint the local supervisory authority about the processing of your Personal Data. In Greece, the supervisory authority for data protection is the Data Protection Authority - www.dpa.gr/.

9.2 As the protection of your privacy is a priority for our Company, you can contact our Company at any time and with any issue or complaint you may have regarding the processing of your Personal Data.

9.3 In addition, our Company proposes that you choose alternative dispute resolution - mediation as a more flexible means of resolving disputes between you and our Company. The protection of your privacy is a priority for our Company and for this reason you have the possibility to contact the DPO we have appointed for any issue or complaint you may have regarding the processing of your Personal Image Data.

10. Amendments to this Second Level Notice

Our Company intends to periodically revise this Notice in order to reflect any changes in its practices or applicable law, in which case the text of this Notice will be updated accordingly.