

**Information on the processing of personal data through a video surveillance system (CCTV) at
ELECTRA PALACE ATHENS HOTEL, Athens, Greece, 18 N.Nikodimou Str.**

1. Data Controller:

XENODOCHIAKI KAI TOURISTIKI ETERIA ELECTRA S.A.

Headquarters: N.Nikodimou Str., Athens, VAT: 094030956, Contact No.: +30 214 100 6200

2. Purpose of Data Processing:

This area is under CCTV surveillance for your personal safety and security. Processing is necessary for the purposes of the legitimate interests that we seek as controller (Article 6 (1) GDPR).

3. Legitimate Interest:

Our legitimate interest is the need to protect our space and the goods found in it from illegal acts, such as theft. The same applies to the safety of life, physical integrity, health and property of our staff, as well as third parties', legally located in the supervised area. We only collect image data and restrict recording to sites where we have assessed that there is an increased likelihood of committing illegal acts e.g. theft, such as at our cash registers and entrance, without focusing on places where the privacy of the persons whose image is taken may be excessively restricted, including their right to respect for personal data.

4. Recipients

The material can be accessed only by our authorized personnel. This material shall not be transmitted to third parties, except for the following cases: (a) to the competent judicial, prosecutorial and police authorities where it contains information necessary for the investigation of a criminal offence involving persons or goods of the controller, (b) to the competent judicial, prosecutorial and police authorities when requesting data, lawfully, in the performance of their duties, and (c) to the victim of an offence, in the case of data which may constitute evidence of the offence.

5. Data Retention

We keep the data for fourteen (14) days, after which it is automatically deleted. In the event that we find an incident during this time, we isolate part of the video and keep it for up to one (1) month longer, so as to the incident and initiate legal proceedings to defend our legitimate interests. If the incident concerns a third party we will keep the video for up to three (3) more months.

6. Rights of the data subject

Data subjects have the following rights:

- Right of access: you have the right to know if we are processing your image and, if applicable, to obtain a copy of it.
- Right of restriction: you have the right to ask us to restrict processing, such as not to delete data that you consider necessary to establish or support legal claims.
- Right to object: you have the right to object to processing.
- Right to erasure: you have the right to request that we erase your data.

You may exercise your rights by sending an e-mail to **dpo@electrahotels.gr** or a letter to our postal address or by submitting the request to us in person at the address of our Company. To review a request related to your image, you should tell us when you were in our CCTV range and provide us an image of yourself to make it easier for us to locate your own data and hide the data of third parties depicted. Alternatively, we give you the opportunity to come to our facilities to show you the images you appear in. We also note that the exercise of a right of objection or erasure does not entail the immediate erasure of data or the modification of the processing. In any case, we will reply in detail as soon as possible, within the deadlines set by the GDPR.

7. Right to lodge a complaint

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

The supervisory authority responsible for Greece is the Data Protection Authority, Kifisias Avenue 1-2, Athens, 115 23, <https://www.dpa.gr/>, tel: +30 210 6475 600