

Notification on the Processing of Personal Data via Video Surveillance System

Data Controller:

MIDEAST INTERNATIONAL TRAVEL SINGLE MEMBER S.A., 105-107 Vasilissis Sofias Ave., Athens, GR-11521, tel. +30 211 211 8888

Purpose and Legal Basis of Processing:

We use a surveillance system for the purpose of protecting individuals and travel documents. Processing is necessary for the purposes of the legitimate interests pursued by us as the data controller (Article 6(1)(f) GDPR).

Analysis of Legitimate Interests:

Our legitimate interest lies in the need to protect our premises and the travel documents within from unlawful acts, such as theft. This also applies to the safety of the lives, physical integrity, health, and property of our staff and third parties lawfully present in the monitored area. We collect only image data and limit recording to areas where there is a higher probability of illegal activities, such as theft, occurring, e.g., our cash registers and entrance, without focusing on areas where individuals' private lives might be excessively restricted, including their right to respect for personal data.

Recipients:

The recorded material is accessible only to our authorized personnel responsible for the security of the premises. This material is not shared with third parties except in the following cases: a) to the competent judicial, prosecutorial, and police authorities when it contains necessary information for the investigation of a criminal act affecting the data controller's people or goods, b) to the competent judicial, prosecutorial, and police authorities when they lawfully request data in the exercise of their duties, and c) to the victim or perpetrator of a criminal act when the data may constitute evidence of the act.

Retention Period:

We retain the data for seven (7) days, after which it is automatically deleted. If we identify an incident within this period, we isolate part of the video and retain it for up to one (1) month for the investigation of the incident and the initiation of legal procedures to defend our legitimate interests. If the incident involves a third party, we will retain the video for up to three (3) more months.

Rights of Data Subjects:

Data subjects have the following rights:

Right of access: You have the right to know if we process your image and, if so, to obtain a copy.

Right to restriction: You have the right to ask us to restrict processing, such as not deleting 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 can exercise your rights by sending an email to privacy@mideast.gr, mailing us at our postal address, or submitting your request in person at our store's address. To review a request related to your image, you need to specify when you were

approximately in the camera's range and provide us with an image of yourself to help us identify your data and obscure third-party data. Alternatively, you can visit our premises to view the images where you appear. We also note that exercising the right to object or erase does not entail immediate deletion of data or modification of processing. In any case, we will respond in detail as soon as possible, within the deadlines set by the GDPR.

Right to Lodge a Complaint:

If you believe that the processing of your data violates Regulation (EU) 2016/679, you have the right to lodge a complaint with a supervisory authority. The competent supervisory authority for Greece is the Hellenic Data Protection Authority, 1-3 Kifisias Ave., GR-115 23, Athens, <https://www.dpa.gr/>, tel. +30 210 647 5600.