

## **INFORMATION REGARDING THE PROCESSING OF YOUR PERSONAL DATA - MONITORING**

### **Who is your data controller?**

The controller, i.e. an entity that decides how your personal data will be used – in the form of recording your image on CCTV – is a special purpose vehicle established for the implementation of a specific construction project. You can find the current list of YAREAL POLSKA group’s special purpose vehicles [HERE](#) (hereinafter referred to as: “**the Controller**”, “**we**”). An area under video surveillance is marked as such.

### **How can you contact us for more information about the processing of your personal data?**

If you have any questions about the processing and protection of your personal data, you can contact YAREAL POLSKA group’s data protection officer by email: [iod@yareal.com](mailto:iod@yareal.com).

### **Where did we get your data from?**

We collected your personal data in the form of an image, because you were in an area under video surveillance carried out by the controller.

### **What is the purpose and legal basis for processing your personal data?**

We process your personal data in the form of a recorded image for the purposes of **our legitimate interest** (Article 6(1)(f) of the GDPR, i.e. to ensure the security of property the Controller and to ensure the safety of employees and residents of a building owned by the Controller, and, as appropriate, also to ensure the safety and security of property on the construction site during construction.

### **What are your rights in relation to your personal data?**

In accordance with data protection legislation, you have the right of access and erasure of your data, restriction of its processing, the right to data portability, and the right to object to the processing of your personal data. You also have the right to lodge a complaint with a supervisory authority (President of the Personal Data Protection Office).

<b>RIGHT TO</b>	<b>WHEN?</b>
ACCESS TO PERSONAL DATA INCLUDING OBTAINING A COPY OF PERSONAL DATA (Article 15 of the GDPR)	You can exercise it at any time. This right applies only to your personal data. If this data is inextricably linked to other personal data, you may only obtain an extract from such documents and information or you may be denied access in justified cases. A refusal of access may result, <i>for example, from contractual confidentiality obligations or laws on the protection of trade secrets</i> (Article 15(4) of the GDPR).

	Remember that if you request further copies of your data, the controller may charge a fee based on administrative costs (Article 15(3) of the GDPR).
ERASURE “RIGHT TO BE FORGOTTEN” (Article 17 of the GDPR)	<p>You can request this from the controller when:</p> <ul style="list-style-type: none"> <li>• the personal data are no longer necessary in relation to the purposes for which they were collected;</li> <li>• you have withdrawn your consent on which the processing was based;</li> <li>• you object to the processing and there are no overriding legitimate grounds of the controller;</li> <li>• the processing is unlawful;</li> <li>• there is a legal obligation to erase your data.</li> </ul>
RESTRICTION OF PROCESSING (Article 18 of the GDPR)	<p>You can request this from the controller when:</p> <ul style="list-style-type: none"> <li>• you object to the processing – you may request restriction of processing of your personal data for a period enabling us to verify whether your objection is well-founded;</li> </ul> <p>In addition, this right can be applied when:</p> <ul style="list-style-type: none"> <li>• the processing is unlawful and you oppose the erasure of the personal data;</li> <li>• the purpose of the processing has been achieved by the controller, but they are required by you for the establishment, exercise or defence of legal claims;</li> </ul> <p>- the data is stored until you request to have it erased.</p>
OBJECT (Article 21(1) of the GDPR)	Following such a request, the controller will assess whether its legitimate interest overrides your rights and freedoms ( <i>e.g. the controller must process your personal data to secure a claim</i> ).
A COMPLAINT WITH A SUPERVISORY AUTHORITY (Article 15(1)(f) of the GDPR)	At any time you believe that your data is being processed unlawfully.

### **Where can you lodge a complaint related to the processing of your personal data?**

You have the right to lodge a complaint related to the processing of your personal data by us with a supervisory authority, which is the President of the Personal Data Protection Office (address: Personal Data Protection Office, ul. Stawki 2, 00-193 Warszawa).

### **How long do we keep your personal data for?**

Personal data in the form of an image recorded on the controller's video surveillance system is kept for no longer than 40 days from the date of recording, and then is permanently erased (by overwriting it).

**Who do we share your personal data with?**

We share your data with monitoring service providers, property managers and security companies that operate the CCTV system in individual projects on behalf of the controller.

All processors that process your personal data for us are required to provide appropriate technical and organisational measures to ensure the protection of your personal data. The processors that process your personal data for us may only process it only on our documented instructions and for the purposes indicated by us.

Monitoring data may also be made available to competent authorities to defend and exercise claims – *e.g. to the police if destruction of a vehicle parked in front of the project building was recorded on cameras and its owner reported the event to the police and requested that the perpetrator be prosecuted; or to the common court if an incident involving a slip in the building hall was recorded and the injured person claims compensation for it.*

**Do we process your personal data automatically (including through profiling) in a way that affects your rights?**

Your data will be processed by automated means; as a result of such processing you will not be subject to any decisions that have legal, financial or other similar consequences.