

Announcement on the protection of personal data collected through video surveillance

1. Data processing controller:

The company under the name “Hellenic Electricity Distribution Network Operator” and the distinctive title “HEDNO SA” or “HEDNO”, with seat at the Municipality of Athens, Prefecture of Attica, 20 Perraivou and 5 Kallirrois Street, 117 43 – Athens, VAT no. 094532827 - TAX OFFICE FAE Athens.

2. Purpose and legal basis of processing data:

We are using a system of surveillance with the purpose of protecting persons and goods. The processing is necessary for the fulfillment of the legitimate interests pursued by the data processing controller (article 6 para. 1. GDPR).

3. Legitimate interests analysis

Our legitimate interest means the need to protect our premises and the goods located thereof against illegal acts, including, but not limited to, theft. The above statement also applies for the protection of life, physical integrity, health and property of our staff and third parties who are legally present in the surveilled premises. We are strictly and exclusively collecting image data and we are limiting surveillance in areas for which it has been assessed that it is necessary to operate cameras for the fulfillment of the above purposes, namely areas for the entrance and exit of persons and vehicles. The cameras we use are not focusing on the faces of employees or other persons legally present in our facilities and are not located in areas where their installment would excessively limit the privacy of the persons whose image is collected, including their right for respecting their personal data.

4. Recipients

The data kept are accessible only by especially authorized personnel at our company, who are responsible for the safety of the premises. These data are not shared with third parties, excluding: a) competent police and prosecution authorities, when data include evidence necessary for the investigation of any offense pertaining to the persons or goods of the data controller, b) competent judicial, police and prosecution authorities who legally ask for data during the execution of their duties c) the victim or the offender of an offense, when these data may be including evidence proving the act.

5. Period of time during which data are kept

We are keeping the data for a period of fifteen (15) working days, after which period they are automatically erased. If, during this period, we become aware of an incident, we make sure to

isolate the respective video footage and we keep it for up to one (1) extra month, in order to facilitate the investigation of the incident and the commencement of legal procedures for defending our legitimate interests, and if the incident is pertaining to a third party, then we keep the footage for up to three (3) months more.

6. Rights of the data subjects

Regarding your personal data which are submitted in the above-mentioned processing, you have the following rights in accordance with the applicable legal conditions:

- Right of access: You have the right to learn about whether we are processing your footage, and if we do, receive a copy thereof.
- Right to restriction: You have the right to request restriction of the processing, such as not erasing data which you believe are necessary for the foundation, execution or defending of legal claims.
- Right to object: You have the right to object to the processing.
- Right to erasure: You have the right to request erasure of your data.

You can exercise your rights by contacting us at: data_privacy@deddie.gr or dpo@deddie.gr, or sending a letter to our postal address. In order for us to examine your image-related request, you must be able to determine the date and time during which you fell within the range of the cameras and send us a photo of yours to help us detect your data and conceal third party data. Alternatively, you can visit our premises and we can show you the footage in which you are appear. Please also note that the exercise of your right to object or your right for erasure does not involve the immediate erasure of data or amendment of the processing. In any case, we can respond to any requests at the soonest and within the deadlines set by applicable legislation.

7. Right to file complaint

If you believe that the processing of data related to you is violating Regulation (EU) 2016/679, you have the right to file a complaint to the supervisory authority.

The competent supervisory authority in Greece is the Personal Data Protection Authority, Kifisias 1-3, 115 23, Athens, <https://www.dpa.gr/>, tel. 2106475600, email: complaints@dpa.gr.