

PRINCIPLES FOR OPERATION OF CAMERA SYSTEM IN THE PREMISES OF COLOGNIA PRESS A.S.

I.

INITIAL PROVISIONS

- 1.1. In compliance with the Regulation 2016/679 of the European Parliament and Council (EU) of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on free movement of such data and on repealing the Directive 95/46/ES (General directive on personal data protection, hereinafter also referred to as „GDPR“) Colonia press, a.s., with its registered office in Kolín IV, Havlíčkova 844, post code 28000, ID: 26186292, maintained at the Municipal Court in Prague under the reference number B 6634 (hereinafter also referred to as the “Controller”) informs any persons present in the Company premises (hereinafter also referred to as the “Subjects”) that **they are monitored by camera system.**
- 1.2. These principles inform about conditions under which the camera system may be operated in the Company premises and about any consequent rights and obligations.
- 1.3. The purpose of the camera system operation is protection of rights and legal interests of the company, in particular the general protection of the Company property and protection of health and property of any persons present in the Company premises.

Okomentoval(a): [LP1]: Please state the Company name and identification details, including the registered office, identification number and data on reference number.

Okomentoval(a): [LP2]: If needed, please specify the purpose of camera system operation according to your needs.

II.

INFORMATION ON CAMERA SYSTEM OPERATION

- 2.1. Camera system monitors the Company premises and makes a visual record. This record includes personal data in the form of face image of persons present in the Company premises.
- 2.2. This personal data is collected based on the legal interest of the Company provided the persons present in the Company premises are moving randomly or it concerns the Company employees or consents of persons present in the Company premises in other cases.

Okomentoval(a): [LP3]: If needed, please modify the category of personal data recorded by the camera system.

III.

LOCATION OF CAMERA SYSTEM

- 3.1. Individual cameras are located in the area of:
 - 3.1.1. Production
 - 3.1.2. Car park
 - 3.1.3. Entrance to the building
- 3.2. The camera system records public space of the Company only. The camera system is not operated in premises such as toilets, changing rooms etc., which are used for private purposes of persons present in the Company premises.

Okomentoval(a): [LP4]: Kindly specify the location of cameras within the Company.

Okomentoval(a): [LP5]: If applicable, please modify to reality.

IV.

INFORMATION SIGNS

- 4.1. Premises, where the camera system is located, are clearly identified with information signs explicitly implying that this area is monitored by the camera system.

Okomentoval(a): [LP6]: If applicable, please define another means for the identification of monitored premises.

V.

PROCESSING OF PERSONAL DATA RECORDED BY THE CAMERA SYSTEM

- 5.1. The camera system is operated continuously based on a motion sensor.

- 5.2. During the working hours, the camera system is monitored by the production managers in the foreman room.
- 5.3. Records from the camera system are kept for 20 days. This period is necessary to ensure that a record may be traced efficiently in case of an event, the recording of which is the purpose of the camera system operation.

Okomentoval(a): [LP7]: Please state the period for record retention.

VI.

SECURITY OF THE CAMERA SYSTEM

- 6.1. The following persons have access to the records made by the camera system:
- 6.1.1. Ivo Novák, IT Infrastructure Administrator, ivo.novak@cogniapress.com
- 6.1.2. Dušan Převertil, Production Manager, dusan.prevertil@cogniapress.com
- 6.2. Any persons that the Company engages in processing of personal data included in a visual record shall meet the GDPR requirements.
- 6.3. Entrance to the operation room of the camera system is protected against unauthorized intrusion with a lock.
- 6.4. Access to the records from the camera system is protected with passwords against unauthorized access.
- 6.5. Access to the records from the camera system is registered with a record in an Excel file.

Okomentoval(a): [LP8]: In this part, please define applied technical and organizational measures. The below mentioned provisions regarding organizational and technical measures are given as an example. It is possible to add or remove any measures as needed.

VII.

RIGHTS OF PERSONS PRESENT IN THE COMPANY PREMISES

- 7.1. The Subject is entitled to exercise the below mentioned rights against the Controller in the extent and under the conditions defined in GDPR, Chapter III.:
- 7.1.1. Right of access to personal data by the Subject: You have the right to obtain from the Controller a confirmation whether the Controller processes personal data related to you. Provided your personal data is processed, you are entitled to gain access to such data. This access may include e.g. information on the purpose of processing, categories of personal data and information on the source of personal data. In addition, you are entitled to require a copy of the personal data processed.
- 7.1.2. Right to rectification: You have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning you, which are processed by the Controller.
- 7.1.3. Right to erasure: Provided any of the reasons specified by GDPR occurs (e.g. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed or your consent is withdrawn), you have the right to obtain from the Controller the erasure of personal data concerning you without undue delay. This right is not applicable without restriction. Data are erased, e.g. in case data are processed based on legal obligation.
- 7.1.4. Right to restriction of processing: You have the right to obtain from the Controller restriction of processing in cases specified by GDPR. For example, it regards a situation when the accuracy of the personal data is contested by you, for a period enabling the Controller to verify the accuracy of the personal data.
- 7.1.5. Right to data portability: In some cases, specified in GDPR (e.g. the processing is based on your consent), you have the right to receive your personal data from the Controller in a structured, commonly used and machine-readable format and have the right to transmit those data to another Controller. You also have the right to have the personal data transmitted directly from one Controller to another, where technically feasible.
- 7.1.6. Right to object: You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you provided the processing is necessary for the performance of a task carried out for reasons of public interest or exercise of public authority or legal interests of the Controller or a third party, including profiling based on these provisions. You

have the right to object to processing of personal data concerning you for the purposes of direct marketing.

- 7.1.7. Automated individual decision-making, including profiling: You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. This right shall not apply in all cases, e.g. provided the decision is necessary for entering into, or performance of, a contract between you and the Controller.
- 7.2. A person present in the Company premises (except for persons where the consent is not required), may withdraw its consent to processing of his/her personal data at any time in compliance with GDPR, Article 7.3. The withdrawal of consent has no effect on legality of the processing performed before the withdrawal.
- 7.3. To exercise the rights according to GDPR, the Subjects are entitled to contact a person authorized by the Controller via email: gdp@coloniapress.com, _____

Okomentoval(a): [LP9]: Please complete your contact details

VIII. FINAL PROVISIONS

- 8.1. These Principles come to effect on 1 May 2018.

On behalf of the Controller

In Kolín, on 17 April 2018

Václav Dřízhál
IT Manager