NOTICE ON THE PROCESSING OF PERSONAL DATA THROUGH A CLOSED-CIRCUIT TELEVISION (CCTV) SYSTEM

1. **Data Controller:**

   The company under the name «enaon Sustainable Networks Single-Member Société Anonyme» (trade name «enaon»), having its registered office in the Municipality of Athens, Greece, at 109-111 Mesogeion Avenue, registered with the General Commercial Registry (GEMI) under registration number 154717401000, with Tax Registration Number (TIN) 996806819, KEFODE ATHENS TAX OFFICE.

2. **Purpose of Processing and Legal Basis:**

   We use a surveillance system for the purpose of protecting individuals, property and assets. The processing is necessary for the purposes of the legitimate interests pursued by us as the data controller (Article 6 par.1. of the GDPR).

3. **Assessment of Legitimate Interests:**

   Our legitimate interest lies in the need to protect our premises and the assets located therein from unlawful acts, including, indicatively, theft. The same applies to safeguarding the life, the physical integrity, health, and property of our personnel and third parties who are lawfully present within the monitored area. We collect only image data and limit the recording to areas that, following the risk assessment, have been identified as presenting an increased likelihood of unlawful activity, such as the entrances to and perimeter of our facilities, key access points used by third parties, and substations. We do not focus on areas where individuals' privacy could be disproportionately infringed, including their right to the protection of personal data. The above legitimate purpose cannot reasonably be achieved through less intrusive means and the rights of individuals within the monitored areas are not overridden by our interests. It is expressly noted that the CCTV system is not used for purposes such as monitoring employees for supervision/ performance evaluation or training purposes and no audio recording is carried out.

4. **Recipients:**

   The recorded footage is accessible only to authorized personnel responsible for the security of the premises. In particular, pursuant to a dedicated service agreement, the security of the premises has been entrusted to specialized security personnel employed by a third-party security services provider. The recorded footage is not disclosed to third parties, except in the following cases: a) to the competent judicial, prosecutorial law enforcement authorities where it contains information necessary for the investigation of a criminal offence, involving persons or property of the data controller; b) to the competent judicial, prosecutorial and law enforcement authorities when such authorities lawfully request the data in the performance of their duties, and c) to the victim or perpetrator of a criminal offence, when the data may constitute evidence of the offence.

5. **Data Retention Period:**

We retain the data for fifteen (15) days, after which they are automatically deleted. If, during this period, an incident is identified, we isolate the relevant part of the video recording and retain it for up to one (1) additional month, for the purpose of investigating the incident and initiating legal proceedings to protect our legitimate interests. If the incident concerns a third party, the relevant video recording may be retained for up to three (3) additional months.

6. Rights of Data Subjects:

Data subjects have the following rights:

- Right of Access: You have the right to know whether we process your image data and, if so, to obtain a copy thereof.
- Right to Restriction of Processing: You have the right to request that we restrict the processing of your data, for example, by preventing the deletion of data that you consider necessary for the establishment, exercise or defence of legal claims.
- Right to Object: You have the right to object to the processing of your personal data.
- Right to Erasure: You have the right to request the deletion of your personal data.

You may exercise your rights by sending a request via email to **dpo.gdpr@ena-on.gr**, accompanied by appropriate proof of identity. In order for us to assess a request relating to your image data, you will need to indicate approximately when you were within the range of the cameras and provide us with a photograph of yourself, to assist us in locating your personal data and, where necessary, obscuring the personal data of third parties appearing in the footage. Please note that exercising the right to object or the right to erasure does not automatically result in the immediate deletion of data or modification of the processing. In all cases, we will provide you with a detailed response as soon as possible and within the time limits defined by the GDPR.

For further information on how we handle your personal data, please refer to our updated Privacy Policy, available on our website.

7. Right to submit a complaint:

If you believe that the processing of your personal data violates Regulation (EU) 2016/679 (GDPR), you have the right to submit a complaint to the supervisory authority.

The competent supervisory authority in Greece is the Hellenic Data Protection Authority (HDPA), 1-3 Kifisias Avenue, 115 23, Athens, https://www.dpa.gr/, tel. 2106475600.