

## ZÁÉV Zrt.

### **Data management related to surveillance cameras CCTV and access control systems**

ZÁÉV Zrt. (hereinafter: Data Controller) uses an *electronic surveillance system* (hereinafter: camera system) at its headquarters and office buildings, as well as at the site of construction project implementations, as well as in certain construction areas to enforce the legitimate interests of the Client (builder, investor, as a 3rd party) and/or of the Data Controller, *time-lapse cameras* have been placed, which periodically record still images.

Purpose of data management: The protection of assets owned or used by the Data Controller, the construction materials in the construction area, as well as the personal data and trade secrets stored in electronic and printed form on the sites, as well as monitoring the implementation of the investment through the operation of time lapse cameras, i.e. the construction of the facility, observation of territorial formation.

Categories of data subjects: persons entering the office buildings and the construction area.

Categories of personal data: Image recordings (the image of the person in the camera's field of view) and additional personal data in connection with the monitoring (e.g. the behaviour of the person concerned).

Legal basis for data processing: Article 6, (1) (f) of GDPR, the legitimate interest of ZÁÉV Zrt

Information for data subjects:

- A warning sign (information board, pictogram)
- Information for data subjects
- Camera rules

Duration of storage, cancellation deadline: maximum 10 working days (based on the balance of interests test)

Storage can be extended in the following cases:

- serves as evidence in accordance with the purpose of data management
- at the explicit request made by the data subject.

Data transfer: Only for the purpose of investigating an illegal act to the relevant authority. Data is not transferred to third countries or international organizations.

General data security measures: The Data Controller and the operator of the camera system take the necessary organizational and technical measures to protect personal data.

Right of data subject: Any person whose right or legitimate interest is affected by the recording of the images may, within 3 business days from the date of image recording, by proving his right or legitimate interest, request the data controller not to destroy or delete that data.

ZÁÉV Zrt. does not use a camera system in a room in which monitoring may violate human dignity, especially in dressing rooms, washrooms or, for example, a place providing first aid, as well as premises that have been designated as areas where employees spend their breaks between work.

ZÁÉV Zrt. uses an *electronic access control system* in some construction areas or requests the entry of personal data for the purpose of the implementation of the project and the safety of the construction site.

The purpose of data management is to check as quickly as possible whether the persons present are authorised to stay in the area. In addition, there are assets and high-value machinery, construction materials on the work site, and personal data stored on site in electronic and printed form, within this framework the aim is to prevent illegal acts as well and, when necessary, to be used as evidence in related court or other official proceedings. In addition to the above, in the event of suspicion or confirmation of a virus infection in the construction area, the necessary measures and the provision of data to the competent authorities shall be taken.

Categories of the data subjects: persons entering the construction site.

Legal basis for data management: Article 6 (1) (f) of GDPR, the legitimate interest of ZÁÉV Zrt.

Information for data subjects:

- Information for data subject

Where the recording of personal data are required to enter the construction area and to prepare the access card, and if necessary, a data processor (subcontractor) will be used for this data management.

- Duration of storage, deletion deadline: defined in the relevant information for data subject.

Data transfer: Only for the purpose of investigating an illegal act to the relevant authority. Data is not transferred to third countries or international organizations.

General data security measures: the Data Controller and the operator of the camera system take the necessary organizational and technical measures to protect personal data.

In relation to the above, the annex referred to in point 5 '*Scope of processed personal data*' of ZÁÉV Zrt's general data protection document provides additional information.