

## INFORMATION STATEMENT

### On the Processing of Personal Data

#### Through Video Surveillance System (CCTV)

In accordance with the provisions of Regulation (EU) 2016/679 (hereinafter "General Data Protection Regulation" or "GDPR"), Law 4624/2019 and the applicable legislative and regulatory framework, EYDAP makes this statement regarding the processing of your personal data in the context of the operation within its premises of a closed circuit television (CCTV) system.

Personal data controller	The Public Limited Company under the name "Water Supply and Sanitation Company of the Capitol SA" (EYDAP SA) - AFM 094079101 - DOY FAE ATHENS, located in Galatsi, Attica (156, Oropou Street) as legally represented
Personal data processor	Specialised companies that provide maintenance and technical support for the systems, whose details you can obtain upon request. The processors are bound by a written contract ensuring the confidentiality and security of the processing.
CCTV / Control Points	At specific entry/exit points (e.g. main entrance/entrances of buildings/offices) and in special areas of crucial archives and/or crucial infrastructure of EYDAP SA, cameras have been installed, taking only real-time image data of persons entering EYDAP's premises. Before the visitor enters an area within the range of the video surveillance system, there are prominent signs for a first level of visitor information. The video surveillance system is in continuous operation, i.e. twenty-four (24) hours a day, seven (7) days a week. It is noted that EYDAP does not obtain video from areas where video surveillance is not anticipated such as WC areas, food service areas, public street, offices.
What data we collect	The personal data collected is just image data. We do not process audio nor biometric data. The images relate to any individual (staff, partners, suppliers and

	other visitors) who enters the range of the cameras within EYDAP's building.
Purpose of processing / legal basis for processing	The use of a video surveillance system by EYDAP SA takes place for the purpose of protection of property, security of people and goods within its premises. The processing is carried out for the protection of the legitimate interests of EYDAP SA, as defined in Article 6 par. 1f' of the General Data Protection Regulation (EU 679/2016) in conjunction with Law 4624/2019, taking into account Directive 1/2011 of the Data Protection Authority (DPA) and the European Data Protection Board (EDPS) Guidelines 3/2019.
Legitimate interest analysis	EYDAP's legitimate interest as a crucial infrastructure consists in the need to protect its building facilities, part of which belong to the Greek state, the information and other infrastructures and goods, such as water, information systems, etc., which are kept within them from illegal acts, such as theft, vandalism, damage to public property. In addition to the above, with a special sense of responsibility and respect for people, the above framework of protection also includes the safety of life, physical integrity, health and property of our staff, our partners, suppliers, the consumer public, in general, visitors entering the monitored area. Data collection is limited to image capture and in places where we have assessed that there is an increased likelihood of committing illegal acts and increased protection of people and property, e.g. at entry points, without focusing on places where the privacy of the individuals whose image is taken may be unduly restricted, including their privacy in respecting personal data.
Log data recipients	There is a specific procedure and policy for access to video surveillance material. Access is only granted to certain competent and authorized personnel of EYDAP responsible for the security of the site and the management of the procedure. With regard to the

	<p>management of the material and specific access to it, the personnel of the Health, Safety, Environment and Quality Directorate and its partners are responsible, bound by strict confidentiality and privacy clauses.</p> <p>This material shall not be made available to third parties. However, only in the following cases is an exception made:</p> <ol style="list-style-type: none"> <li>1. To the competent judicial, prosecutorial and police authorities when it contains information necessary for the investigation of a criminal offence involving our people or property.</li> <li>2. To the competent judicial, prosecutorial and police authorities when they lawfully request data in the exercise of their duties.</li> <li>3. To the victim or perpetrator of a criminal offence, where the data concerned are likely to constitute evidence of the offence, while respecting the protection of the personal data of other persons as far as possible, and</li> <li>4. Where applicable and to the extent necessary, to natural and legal persons - partners of EYDAP, to whom it entrusts the performance of specific individual tasks on its behalf (as "Processors") regarding the maintenance and upkeep of the said recording equipment and the security of the installations and who are bound by adequate contractual terms for compliance with the principles and requirements of the GDPR on a case-by-case basis.</li> </ol>
Data retention	<p>The data is stored in an encrypted storage device. We keep data for up to fifteen (15) days, after which they are automatically deleted in a secure and non-recoverable manner. In the event that an incident is detected during this period, EYDAP isolates part of the video and keeps it for up to one (1) more month, in order to investigate the incident and initiate legal proceedings to defend its legitimate interests, while if</p>

	the incident involves a third party, the video is kept for up to three (3) more months. The footage shall be further retained if deemed necessary on a case-by-case basis to support or rebut any legal claims.
Data security	EYDAP implements appropriate technical and organizational safeguards for the security of the personal data of individuals processed in the context of its activities on a case-by-case basis, and in particular of the data collected through the video surveillance system in its premises. Specifically: a. Network security and protection procedures and policies are applied, security in special computer rooms, encryption, passwords, b. Restricted access policies are implemented both to the logging infrastructure and to the logging information; c. A Data Processing Officer and a DPO have been appointed; d. Procedures for secure transfer of data in case of a request are implemented. Storage takes place in a dedicated restricted and controlled access infrastructure. Copies shall be provided with blurring of other persons to minimize data.
Your rights	<p>The data subject has the following rights to the material of the video surveillance system in accordance with Articles 12-22 GDPR, the provisions of Law 4624/2019 and under the relevant more specific conditions and restrictions, to the extent that they apply to the use-processing of video surveillance data:</p> <ul style="list-style-type: none"> <li>- Right of access: i.e. to be informed whether EYDAP is processing your image data and, if so, to receive a copy after taking appropriate measures on a case-by-case basis so as not to infringe the rights of other persons to whom the material relates</li> <li>- Right of restriction: i.e. to request that the processing in question be restricted, such as, for example, that data which they consider necessary for the establishment, exercise or support of legal claims are not deleted within</li> </ul>

	<p>the prescribed period, without EYDAP carrying out additional processing.</p> <ul style="list-style-type: none"> <li>- Right to object: i.e. to the processing carried out.</li> <li>- Right to erasure: i.e. to request that the relevant data be erased, subject to the reservations of the GDPR and Law 4624/2019. It is clarified that this right is conditional and subject to the obligations, interests and any legal claims of the Company for their preservation, based on the applicable laws and regulations.</li> <li>- Right to complain to the PDPA: If you believe that the processing of your data violates the applicable legal and regulatory framework for the protection of personal data, you also have the right to lodge a complaint with the competent supervisory authority {The Personal Data Protection Authority (<a href="http://www.dpo.gr/">http://www.dpo.gr/</a>), Ave. Kifissia 1-3, 11523, Athens, Greece, telephone number 210 6475600, e-mail <a href="mailto:contact@dpo.gr">contact@dpo.gr</a> }</li> </ul> <p>Please note that the exercise of the right to object or erasure does not imply the immediate deletion of data or the modification of processing.</p>
<p>Procedure for exercising rights</p>	<p>A. Rights may be exercised as follows:</p> <ul style="list-style-type: none"> <li>- by submitting an electronic request to the DPO of EYDAP at <a href="mailto:dpo@eydap.gr">dpo@eydap.gr</a></li> <li>- by sending a letter or delivering it to the address of the DPO of EYDAP, or by contacting her by phone at 210 7495156 &amp; 210 7495356</li> </ul> <p>B. The applicant is required for the service of the request:</p> <p>(a) to identify the period of time during which he or she was within the range of the cameras, giving a picture of himself or herself, in order to facilitate the identification of the requested data and the concealment of the data of third persons depicted,</p>

	<p>(b) to appear in person at EYDAP's premises upon request in order to be shown the images in which he appears.</p> <p>EYDAP will make every effort to carry out the required actions within 30 days from the date of receipt of the request, unless the actions to be carried out are extraordinary and/or complicated and therefore it reserves the right to extend the time for completion of the actions. In any case, you shall be informed, through the Data Protection Officer, of the progress of the request within 30 days of its submission.</p>
<p>Policy Review {last review...}</p>	<p>EYDAP reserves the right to update this policy at any time.</p> <p>To this end, please check this Information Policy regularly in order to be informed of any changes that have taken place.</p>