

Notice for use of surveillance cameras

The hotel Astir Odysseus Kos uses a camera system in its premises. This notice concerns all cameras operating within this system.

- Data Controller & Data Protection Officer

The company "OCCIDENTAL S.A." with registered offices at Kos, Mpamialiki 85300, with VAT 998922193, (hereinafter 'the company') is the Data Controller for the data processed through the camera system.

The company has appointed a Data Protection Officer. You may always contact the Data Protection Officer sending an email at the address dpo@astirodysseuskos.gr.

- Which cameras do we use?

We use surveillance cameras.

Surveillance cameras are the systems which are permanently located at a space, operating continuously or very often and which may take and/or transmit image signal from this space to a closed number of screens and recording systems. Closed Circuit Television (CCTV) are part of the surveillance cameras system. The company uses surveillance cameras which take and transmit image signal, but not sound signal. The transmission of the image may take place through directly linking the camera at the screen or the recording system.

- Why and under which legal basis do we use the cameras?

The company uses the surveillance camera system to supervise the security of its hotel premises. The company aspires to provide the best security level possible in its premises. The use of surveillance cameras is essential to this end. The processing of personal data for this purpose is based on the legitimate interest of the company to monitor the security of its premises, including the property and people inside the premises.

- Rules we implement

In all hotel premises, the installation and use of cameras focuses solely on the points of interest. Thus, the proper operation of the company and the hotel is ensured, as well as the monitoring of security of persons and property.

The surveillance cameras used are static with focus capability.

The video surveillance of employees at working hours is prohibited, unless:

- Justified by the nature of the specific work and the employee has been notified
- Is necessary for the protection of health and security of the employees and the monitoring of critical working spaces, and the employees have been notified

The surveillance cameras of the company do not in general monitor the actions of employees during working hours. Employees may at times appear in the system, but their actions are not monitored in any case.

Under no circumstances employees' personal data collected through the surveillance system shall be used for the assessment of the employees and associates of the company.

Video surveillance is prohibited if the "core of the right to privacy is violated", such as in toilets and toilet anterooms.

Moreover, external cameras do not receive image from nearby streets and pavements or entrances of nearby houses, buildings, or other spaces. In exceptional circumstances such a recording may be permitted, if it concerns a space with augmented security needs, where offences against life and/or property have taken place and there are justified suspicions that more offences are likely to take place again. In such cases, the recording shall confine in the strictly necessary area. No such circumstances apply at present.

- **For how long do we keep the camera recordings?**

For 5 days after the recording. We may keep a part of the recording for more than 5 days, only if:

- An incident against a third person takes place (i.e. theft, robbery, beating). In this case, the company may keep the respective part of the recording at a separate file, with special protective measures, for 3 months after the incident.
- An incident against the company takes place (i.e. theft, damage to company property, economic corruption). In this event, the company has the right to keep at a separate file, with special protective measures, for 30 days after the incident.

- **Who has access to the recordings?**

Only the authorized personnel. The company does not give access to any third party and takes all necessary measures to prevent the access of third parties to the recordings.

The recordings may:

- Be handed out to a competent judicial, public or police authority upon their request.
- Be handed out to the person which the images concern, upon its request. A copy of the image may be provided -blurring the faces of third persons- or, if the data subject agrees, a simple demonstration of the image may take place, without covering the faces of third persons.

In any case, the recordings are always kept within Greece. Thus, they are protected under Greek and EU legislation.

- **Your Rights**

You have the following rights regarding your personal data	
Right to information	You have the right to be informed about the collection and processing of your personal data
Right to access	You have the right to receive confirmation from us as to whether or not your personal data is being processed and, if so, you have the right to

	access your personal data in a concise, comprehensible, transparent and easily accessible form.
Right to correction	You can request and we will ensure that without undue delay we will correct inaccurate or incomplete personal data, including via a supplementary statement.
Right to erasure	You have the right to ask us to delete the personal data that concern you, without undue delay and we will proceed with the deletion, under the conditions set by the law.
Right to processing limitation	You have the right to ask us to limit processing activities to specific purposes only, subject to the conditions set by the law.
Right to object	You have the right to object, at any time and for reasons related to your particular situation, to the processing of personal data concerning you. We will no longer process personal data unless there are compelling and legitimate reasons for processing that override your interests, rights and freedoms or to establish, exercise or uphold legal claims.
Right to data portability	You have the right to receive the personal data concerning you, which you have provided us with, in a structured, commonly used and machine-readable format, as well as the right to request the transfer of such data to another processor without objection from us under the conditions set by the law.
Right to human interference	You have the right to not be subject to a decision made solely on the basis of automated processing, including profiling, which produces legal effects that concern you or significantly affect you in a similar way.

If you have any questions about this privacy notice or would like to ask for clarification or if you wish to exercise any of your rights or withdraw your consent to any communication, please contact the Data Protection Officer at dpo@astirodysseuskos.gr.

We will respond to your request within thirty (30) days of receipt. In the event that an extension of the above deadline is required for the investigation and / or processing of your request, we will inform you, explaining the reasons why the extension of the deadline is necessary.

In any case, if you feel that the protection of your personal data has been violated in any way, you have the right to file a complaint to the Hellenic Personal Data Protection Authority (www.dpa.gr). For the Authority's jurisdiction and the way of submitting a complaint, you can visit its website where there is detailed information.

- **Modification of this Privacy Notice**

We may make changes to this Notice from time to time. The latest version is the applicable one.

Last Modified: 12/4/2023