

Update on the processing of personal data through video surveillance (Level B Update)

1. Data Controller

The Data Controller is the Société Anonyme under the name "**SOUTH PHILOXENEIA MONOPROSOPI ANONYMI ETAIRIA**", which has its registered office in Corfu, Iasonos & Sosipatrou 47, with GEMI number 177414033000 and Tax Identification Number 802493948, Tax Office of Corfu, with contact telephone number (+30) 26620 61679 / (+30) 26610 28970 and email address info@cabo-corcyra.com, as legally represented (hereinafter "the Company").

2. Data Protection Officer

For issues relating to the present, as well as for any issues that may arise regarding the processing and/or protection of personal data collected through video surveillance systems, please contact the Data Protection Officer by sending an email to: dpo@mayorhospitality.com or by calling +30 2120003102.

3. Purpose of processing

The monitoring of entrance areas and exterior areas of the Company's "Cabo" hotel unit aims to protect its premises and the equipment contained therein (*protection of goods-property*), as well as to protect the natural persons working or entering the premises for any reason (*protection of persons*).

4. Lawful basis of processing

The processing of personal data through a video surveillance system is necessary for the purposes of the legitimate interests pursued by the Data Controller (Article 6 par. 1 (f) of the General Data Protection Regulation 2016/679/EU).

5. Legitimate interests of the Data Controller

The legitimate interest of the Data Controller consists of the need to protect the premises of its above mentioned hotel unit, including the goods located therein, from unlawful acts, such as theft, unauthorized entry and vandalism, as well as from natural phenomena capable of causing damage, such as fire. Furthermore, the Data Controller seeks to ensure, through video surveillance, the safety, physical integrity, health and property of the natural persons within the hotel unit premises (employees, guests or any third party).

The installation of a closed-circuit video surveillance system in entrance areas and exterior areas of the hotel unit (*namely*: entrance for supply vehicles – entrance to warehouses, corridor at the rear of the hotel unit – boundaries with adjacent plot, south entrance of the hotel unit to the swimming pool, south side of the hotel unit – wall/boundaries of the plot towards the sea) is a necessary means of protecting the hotel unit's facilities and equipment, as well as of protecting the natural persons working or entering the premises for any reason, since persons and vehicles entering them are recorded and monitored. In view of the above, in the event of a suspicious or damaging incident, recourse to the recorded visual material is considered necessary to prevent the occurrence of a risk or to find those responsible.

The Data Controller shall collect image data exclusively from those areas, which the Data Controller reasonably considers to have an increased likelihood of illegal activities (***data minimisation***). In addition, the Data Controller declares that their processing of data through the video surveillance system does not extend to areas, where it may unduly restrict the privacy of the persons whose image is taken.

6. Recipients

The material recorded by the video surveillance system is accessible only by authorized personnel of the Data Controller. The Data Controller shall take all appropriate and reasonable measures to ensure the security of the area where the retained material is kept. The retained material shall not be disclosed, communicated or transmitted to any third party, with the exception of the following cases, which are listed exhaustively:

(a) to the competent judicial, prosecutorial and police authorities when it contains data necessary for the investigation of a criminal offence,

(b) to the competent judicial, prosecutorial and police authorities when they lawfully request data in the exercise of their duties, and

(c) to the victim or the perpetrator of a criminal offence when it concerns to data which may constitute evidence of a criminal offence.

7. Storage period

The Data Controller retains the personal data collected only for the period necessary to achieve the purposes of the processing (*limitation of the storage period*). Downloads of the visual material are stored for a period of fifteen (15) days from the time of their recording. After this period, the downloads are automatically deleted.

In the event that during the retention period of the recorded personal data (fifteen days from the time of the recording), an incident is detected or reported, the Data Controller shall isolate the video segment, during which the incident in question takes place, and shall keep it:

(a) for thirty (30) days if the incident affects the legitimate interests of the Data Controller itself and for the legal defense thereof, and

(b) up to three (3) months if the incident affects the legitimate interests of a third party.

8. Rights of data subjects

The Data Controller shall ensure and facilitate the exercise of the rights of data subjects. In particular, as a data subject you have the right to:

(a) to obtain from the Data Controller information as to whether personal data concerning you are being processed and, if so, to obtain access to them (*right of access*),

(b) to request the erasure of your personal data (*right to erasure*),

(c) to object at any time to the processing of your personal data (*right to object*),

(d) to request the Data Controller to restrict the processing of your personal data (for example, you may request the erasure of all your data, except those that you consider necessary for the establishment, exercise or defense of your legal claims) (*right of restriction*).

As data subjects, you are entitled to exercise the above rights by sending an e-mail to dpo@mayorhospitality.com or a letter to our postal address above, or by submitting your request in person at our “Cabo” hotel unit.

In order to effectively process your requests, you are requested, on the one hand, to specify the period of time during which you were within the range of the video surveillance system and, on the other hand, to provide an image of yourself, in order to facilitate the identification of your own data and the concealment of the data of third parties depicted. Alternatively, we offer you the possibility to come to our premises (47 Iasonos and Sosipatrou Street, Corfu), in order to show you the images/material in which you appear.

The Data Controller undertakes the responsibility to comply with the requests submitted in accordance with the above without delay and, in any case, within thirty (30) days of their submission. The Data Controller may extend the above deadline for the execution of requests by a further of sixty (60) days, taking into account the complexity and number of requests to be processed. In any case, the Data Controller undertakes, within thirty (30) days of receipt of the requests, to inform the data subjects of any extension granted, as well as of the specific reasons for the delay in satisfaction of the right(s) in question.

9. Right to lodge a complaint with a supervisory authority

If you consider that the processing of personal data concerning you violates the provisions of the General Data Protection Regulation (EU) 2016/679, Law 4624/2019 and its implementing legislation, you have the right to lodge a complaint with the competent Greek supervisory authority: Personal Data Protection Authority (Leoforos Kifisias no. 1-3, Postal Code: 115 23, Athens, www.dpa.gr, tel: +30 2106475600).