

## Notice on the Electronic Surveillance System

Dear Guest,

We hereby inform you that there is an electronic surveillance system in place at the DIGIC Office Building, and the related data processing actions implemented are described below.

### 1. Name and contact data of the data controller

Company name: **DIGIC PICTURES Filmgyártó, Szoftverfejlesztő és Kereskedelmi Korlátolt Felelősségű Társaság**

Registered office: 1031 Budapest, Záhony utca 7

Company registration number: Cg.01-09-693165

Tax number: 12573383-2-41

Represented by: Sándor RABB managing director

Website: [www.digicpictures.com](http://www.digicpictures.com)

E-mail: [privacy@digicpicutres.com](mailto:privacy@digicpicutres.com)

Hereinafter as: “DP”

Company name: **DIGIC Services Korlátolt Felelősségű Társaság**

Registered office: 1031 Budapest, Záhony utca 7

Company registration number: Cg.01-09-303274

Tax number: 26125921-2-41

Represented by: Sándor RABB managing director

Website: [www.digicpictures.com](http://www.digicpictures.com)

E-mail: [privacy@digicpicutres.com](mailto:privacy@digicpicutres.com)

Hereinafter as: “DS”

DP and DS are considered joint controllers and are hereinafter collectively referred to as “DIGIC”.

### 1. THE SCOPE OF DATA SUBJECT DATA, THE PURPOSE, LEGAL BASIS, AND DURATION OF PROCESSING

SCOPE OF PROCESSED DATA	PURPOSE OF DATA PROCESSING	LEGAL BASIS OF PROCESSING	DURATION OF DATA STORAGE
Data Subjects' images	to protect high-value IT equipment, devices, other assets, to prevent their unauthorized theft to detect/investigate a possible theft	Article 6(1)(f) of the GDPR: DIGIC has a legitimate interest in protecting the high value assets located at its business establishment and the trade secrets in its possession.	<ul style="list-style-type: none"><li>• By default, 3 days from the date of recording.</li><li>• If there is no work (weekend, holiday, public company shutdown), 3 days from the reopening.</li><li>• If the recording is used: until the end of the procedure, after which the recorded data will be erased.</li></ul>
			<ul style="list-style-type: none"><li>•</li></ul>

The individual cameras are listed in Annex 1.

## **2. Persons having the right to access the recordings**

The designated employees of DIGIC (designated associates of the System Division and Facility Division, as well as the IT Coordinator) shall have access to the Recordings. The Recordings are displayed in real time to the associate working at the reception desk, however, they do not have the right to replay the Recordings.

The persons the rights or legitimate interests of whom is affected by the Recordings may, within 3 (three) working days from taking the recording, request DIGIC to refrain from destroying or erasing the data and simultaneously must produce evidence for their right or legitimate interest concerned.

Copies or prints of the Recordings may be made only under controlled circumstances, always documented in a record, exclusively in the event of a Usage event, for the purpose of providing evidence. In such an event the managing director of DIGIC, the COO, the Director in charge of the Legal Area and the designated member(s) of the HR Department will have access to the Recordings in addition to the persons listed above. Only and exclusively the persons specified in this Section shall have the right to make copies or prints.

Any possible data carriers that cannot be erased due to damaging, must be destroyed under controlled circumstances, documents in unique records.

## **3. Data storage, security measures**

The cameras shall be operating 24 hours a day, and shall record the images onto magnetic data carriers (hard disks). The data carrier used for recording and the data stored on them are protected with password and user name. Without this special access right, these data (the recorded images) cannot be run, copied or viewed.

The software recording the Recordings is run on a rescue server. The recording device and the connected cameras form an independent, closed circuit system, which is independent from the IT system of DIGIC, it uses its own operating system and its own mass storage. No separate backup is made of the Recordings.

No sound is recorded by the cameras.

## **4. Exercising the rights of data subjects**

### **4.1. Right of access**

Pursuant to Article 15 of the GDPR, the natural person affected by the data processing (the “Data Subject”) has the right to request information at any time on whether and how his or her personal data are processed by DIGIC, including the purposes of the data processing, the recipients to whom the data have been disclosed or the source from which the data were obtained by DIGIC, the retention period, any of his/her rights in relation to the processing and, in the case of transfers to third countries or international organisations, information on the safeguards relating thereto.

In exercising your right of access, you also have the right to request a copy of the data as follows:

- In your request (in addition to identifying yourself by an identity document, in person or by other means), you must specify the 2-hour interval during which you entered the monitored area.
- The right to request a copy must not adversely affect the rights and freedoms of others, i.e. if other data subjects are identifiable in the image, DIGIC will take technical measures (such as image editing, including obscuring or blurring) to protect the rights of third parties.
- If you submit your request after 3 days from the date of the image capture (or from the date of reopening of the office), DIGIC is obliged to inform you that your personal data has been deleted.
- If your request is excessive or manifestly unfounded, DIGIC may charge you a reasonable fee under Article 12(5)(a) of the GDPR or refuse to act on your request (Article 12(5)(b) of the GDPR).

#### **4.2. Right to erasure ('right to be forgotten')**

Under Article 17 of the GDPR, if you request the erasure of any or all of your personal data, DIGIC will delete them without undue delay:

- if they are no longer necessary for the purpose for which they were originally stored or if the processing is unlawful,
- if you exercise your right to object and there are no overriding compelling legitimate grounds for the processing.

Images cannot be erased if the processing is required for any of the following:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing of the personal data by Union or Member State law to which the controller is subject;
- c) for the establishment, exercise or defence of legal claims.

#### **4.3. Right to restriction of processing**

You may request restriction of the processing of your personal data on the basis of Article 18 of the GDPR in the following cases:

- the processing is unlawful, but you oppose the erasure of the personal data and request the restriction of their use instead;
- DIGIC no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims.

#### **4.4. The right to object**

**Pursuant to Article 21 of the GDPR, if the legal basis for the processing of your data is the legitimate interest of DIGIC or a third party, you have the right to object to the processing. DIGIC is not obliged to uphold the objection if it proves that there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or that the processing is connected to the establishment, exercise or defence of the legal claims of DIGIC.**

#### **4.5. Right to rectification**

In the case of the camera recordings, the possibility to rectify the data is limited and the exercise of the data subject's right is limited.

#### **4.6. Right to make a complaint, right to legal remedy**

If you consider that the processing of your personal data by DIGIC infringes the provisions of the currently effective data protection legislation, in particular the GDPR, you have the right to lodge a complaint with the competent data protection supervisory authority. In Hungary, complaints can be filed with the Hungarian National Authority for Data Protection and Freedom of Information (“**NAIH**”). Contact data of the Hungarian National Authority for Data Protection and Freedom of Information:

**Website:** <http://naih.hu/>

**Postal address:** 1363 Budapest, Pf.: 9.

**Address:** 1055 Budapest, Falk Miksa utca 9-11.

**Phone:** +36 (1) 391-1400

**Fax:** +36 (1) 391-1410

**E-mail:** [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

You can also take legal action under the GDPR and the Information Act. Your detailed rights and the available legal remedies are specified under Chapters III and VIII of the GDPR and Articles 14-23 of the Information Act.

#### **4.7. Time limit for replying to data subject requests**

DIGIC will ensure that if you exercise any of your rights in relation to this processing and contact DIGIC, DIGIC will respond to such requests without undue delay and in any event within 30 days.

**If you wish to exercise any of your rights, or if you have any questions or comments, please contact us using the contact details provided in Section 1 of this Notice.**

<b>CAMERA</b>	<b>RECORDED CAMERA IMAGE</b>
Camera 1	Ground floor main entrance (ascending and descending stairs of the ground floor, spaces in front of the ground floor elevator door)
Camera 2	Ground floor outwards (ascending and descending stairs of the ground floor, ground floor elevator door, reception desk and the spaces in front of them)
Camera 3	Ground floor elevator (main entrance door, the tracks along the two main walls right up to the elevator, with the reception desk excluded)
Camera 4	2nd floor upwards (2nd floor elevator door, 2nd floor descending stairs and the entrance of the left side glass door stepping out of the elevator)
Camera 5	2nd floor downwards (2nd floor descending stairs, 2nd floor: the space in front of the glass door entrance on the left side of the elevator)
Camera 6	3rd floor upwards (3rd floor elevator door, 3rd floor descending stairs)
Camera 7	3rd floor upwards (3rd floor: foreground of the descending stairs right up to the countertop)
Camera 8	Ground floor engine room (ground floor engine room entrance door, back of the 1st rack)
Camera 9	Floor 1 server (floor -1 server room entrance door foreground cold corridor strip)
Camera 10	Minus mezzanine Photoscan and gym entrance doors
Camera 11	Minus mezzanine Photo window (street front windows/storage premise in the Photoscan room)
Camera 12	Floor 1 entrance (floor -1 entrance door)
Camera 13	3rd floor meeting room (3rd floor entrance doors to D2, D3 and D1 rooms)
Camera 14	1st floor stairs (1st floor: space bordered by the glass doors and the elevator door, 1st floor: descending stairs)