

This policy provides information regarding the processing of data through video surveillance systems (CCTV) installed in facilities owned and/or managed by our Company under the name “ANTIPOLLUTION SINGLE MEMBER SHIPPING SOCIETE ANONYME”, as well as in the facilities of another company that informally forms part of the V GROUP, headquartered in Piraeus, at 2 Akti Poseidonos Street.

Our Company, as well as each company belonging to the V GROUP, considers the protection of personal data and the assurance of transparent data processing to be of paramount importance.

The Companies of the Group, acting in their capacity as Data Controllers, comply with the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016) and Law 4624/2019, as applicable from time to time.

1 PURPOSE OF PROCESSING

The operation of the system is governed by Regulation (EU) 2016/679 (GDPR), Law 4624/2019, and the guidelines of the Hellenic Data Protection Authority.

The Companies of the Group use video surveillance systems for the purpose of protecting the most fundamental good, namely human life, of individuals entering and/or working within their facilities, as well as for the protection of these premises and the assets located therein.

2 LEGAL BASIS FOR PROCESSING

This processing is necessary for the purposes of the legitimate interests pursued by us as Data Controllers (Article 6(1)(f) GDPR).

Our legitimate interest consists in the need to protect our premises and the assets located therein from unlawful acts, such as, indicatively, theft. The same applies to safeguarding the fundamental values of life, physical integrity, health, and property of the Group, our personnel, and third parties lawfully present within the monitored area.

More specifically, the processing of image data is carried out based on legitimate interest (Article 6(1)(f) GDPR), for the purpose of:

- protecting life, physical integrity, and property;
- ensuring the safety of employees, visitors, and partners;
- preventing and investigating unlawful activities.

Video surveillance systems or any recording means are not used in areas where there is an increased expectation of privacy, such as restrooms, changing rooms, etc.

Access to the recorded material is granted exclusively to authorized persons, who have designated roles (e.g., Security Officer). These individuals are bound by confidentiality obligations and act in accordance with the principles of necessity and proportionality, as defined by the General Data Protection Regulation (EU) 2016/679 (GDPR) and applicable national legislation.

3 DATA RETENTION PERIOD

Data are retained for fifteen (15) days, after which they are automatically deleted.

In the event of an incident (e.g., theft, robbery, accident), the relevant recorded footage is isolated and stored in a separate archive for as long as required for the investigation of the incident and the initiation of legal procedures to defend the legitimate interests of the Data Controllers and any third party.

4 DATA RECIPIENTS

The processing of data through video surveillance systems takes place within Greece.

The recorded material is accessible only to the authorized security personnel, the Security Officer, and authorized external partners responsible for the security of the premises. These partners are bound by confidentiality obligations and process the data as Data Processors on our behalf and according to our instructions.

The material is not transferred to third parties, except in the following cases:

- a) to competent judicial, prosecutorial, and police authorities when it contains information necessary for the investigation of a criminal act concerning persons or assets of the Data Controller;
- b) to competent judicial, prosecutorial, and police authorities when they lawfully request data in the exercise of their duties.

5 DATA CONFIDENTIALITY AND SECURITY

The Companies of the Group and all parties processing data on their behalf undertake to maintain the confidentiality and security of the processing and, in particular, ensure the protection of the data from any form of unlawful processing throughout the entire retention period by implementing appropriate technical and organizational measures.

Specifically, in order to ensure confidentiality and security of processing:

- The encrypted material is stored in a secure environment with controlled access and password protection.
- Access activities are logged (logbook).
- Unauthorized copying, alteration, or transmission is prohibited.
- Appropriate technical and organizational security measures are implemented.

6 INFORMATION TO DATA SUBJECTS

- For the immediate information of data subjects, clearly visible information signs have been placed in all areas of the facilities owned and/or managed by the Companies of the Group where CCTV systems are installed.
- Employees and visitors may access the information sheet related to this policy by scanning the relevant QR Code.

7 DATA SUBJECT RIGHTS

- **Right of access:** You have the right to receive a copy of the video footage in which you appear. The Data Controller provides a copy of the relevant part of the image recording where the data subject appears, or a printed series of snapshots from the recorded images, or alternatively informs the interested person in writing within the same time period that either they do not appear in the footage or that the relevant recording has been destroyed.
- **Right to restriction:** You have the right to request restriction of processing, for example not to delete data that you consider necessary for the establishment, exercise, or defense of legal claims.
- **Right to object:** You have the right to object to the processing.
- **Right to erasure:** You have the right to request that we delete your data.

You may exercise your rights in writing by sending an email to privacy@vgroup.gr or by calling **+30 210 4292426**.

In order to process an access request related to your image, you may be asked to specify the date and time of your presence and provide your own image, in order to facilitate the identification of your data and verify your identity, as well as to protect and conceal the data of other individuals appearing in the footage.

Please note that the exercise of the right to object or erase does not automatically result in immediate deletion or modification of processing. In any case, we will respond to you in detail as soon as possible and within the deadlines provided by the GDPR.

If, after exercising your rights, you believe that they have not been adequately satisfied, you have the right to lodge a complaint with the Hellenic Data Protection Authority, Kifisias 1-3, 115 23, Athens, <https://www.dpa.gr/>, tel. +30 210 6475600, through its online portal <https://eservices.dpa.gr/>.

8 POLICY REVIEW

This policy is reviewed on a regular basis in order to ensure continuous compliance with the applicable legal and regulatory framework.

Specifically, the review takes place:

- annually, and
- in the event of changes in legislation, technological upgrades, expansion of facilities, or changes in the purpose of personal data processing.

Any revised version of the policy comes into effect immediately upon its publication.

On behalf of the Management,

Ioannis Karamplias

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