

## INFORMATION NOTE ON THE VIDEO SURVEILLANCE ACTIVITY PERFORMED AT PARKLAKE SHOPPING CENTRE

This Information Note refers to the processing of personal data by the closed-circuit television (CCTV) video surveillance system installed at ParkLake Shopping Centre located at 4 Liviu Rebreanu Street, district 3, Bucharest (hereinafter the “Shopping Center”).

### I. THE CONTROLLER AND DATA PROTECTION OFFICER

The Controller is **Parklake Shopping S.A.**, a company with seat at 4 Liviu Rebreanu Street, ParkLake Shopping Center, 2nd level, Administrative Offices, office space no. 6, 3rd district, Bucharest, Romania, telephone number: +40 757 353 014, e-mail address: [contact@parklake.ro](mailto:contact@parklake.ro) (hereinafter referred to as the “Controller” or “Parklake”) it being the entity which determines the purposes and means of the processing of Personal Data.

The Controller has not designated a Data Protection Officer.

### II. PURPOSE AND LEGAL BASIS OF PROCESSING

The Controller installed in the Shopping Centre the CCTV video surveillance system for the purpose of ensuring the security of people and assets within the premises of ParkLake shopping centre. The surveillance activity through the CCTV system is carried out in order to comply with the legal obligation imposed by Law no. 333/2003 regarding the protection of premises, goods, values and individuals (“Law 333/2003”) and Methodological Norms to Law 333/2003 implemented by Government Decision no. 301/2012 (“Methodological Norms”). Thus, the processing (collection, use, storage etc.) of personal data by means of monitoring operations through CCTV surveillance has per lawful basis the compliance with a legal obligation.

The processing is limited to only what is necessary for achieving the Controller’s Purpose of Processing (“data minimization”).

The personal data collected by the Controller is accurate, integral and confidential (“accuracy and confidentiality”).

The processing of personal data is performed for the period needed to fulfil the Purpose of Processing (“storage limitation”). The recorded images are stored for 20 days, according to Appendix no. 1 from Methodological Norms. After such period, the recorded images are automatically erased. However, in case of specific situations, notably when the authorities require copies of the recorded images for the purpose of investigating a potential criminal offence, the storage period is until the delivery of the copy to the authority requesting it, however not exceeding a maximum timeframe of 6 months as of the date of the footage.

### III. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA

The recipients of the personal data processed through the CCTV system are:

- Securitas Services Romania S.R.L. (the provider of security services for the Shopping Center) or any other company which could replace it (Processor);
- Avitech Co. S.R.L. - the provider of maintenance services for the CCTV system installed in the Shopping Center - or any other company which could replace it (Processor);
- Public authorities (police authorities and/or judicial authorities).

#### **IV. THE DATA SUBJECTS' RIGHTS**

In relation to the processing of personal data through the CCTV system installed in the Shopping Centre, the Data Subjects have the following rights:

- a) the right to be informed (as per this note),
- b) the right of access,
- c) the right to restrict processing,
- d) the right not to be subject to automated decision making and profiling.

**Considering that the legal basis for data processing through CCTV systems is the legal obligation stated by Law 333/2003, the following rights of the data subjects are not applicable for this processing, according to the provisions of GDPR:**

- a) the right to rectification,
- b) the right to erase (right to be forgotten),
- c) the right to data portability,
- d) the right to object.

The data subjects can exercise their rights by completing the form available on the website: <https://www.parklake.ro/en/personal-data-protection-commitment/> or by sending an email to [dataprotection@parklake.ro](mailto:dataprotection@parklake.ro)

The data subjects have the right to lodge a complaint with a supervisory authority (i.e. the National Supervisory Authority For Personal Data Processing: <https://www.dataprotection.ro/index.jsp?page=contact&lang=en>).

#### **V. TRANSFER OF PERSONAL DATA TO THIRD COUNTRY/INTERNATIONAL ORGANIZATION**

The personal data collected by the Controller by means of monitoring operations through CCTV surveillance are not transferred to any third countries/international organizations.

#### **VI. EXISTENCE OF AUTOMATED DECISION-MAKING INCLUDING PROFILING**

There is no such automated decision in the processing or in result of the processing.