

## Information provided to data subjects – CCTV system

Company **Barrandov Studio a. s.**, ID: 281 72 469, with its registered office at Prague 5 - Hlubočepy, Kříženeckého nám. 322/5, Postal Code 15200 (hereinafter referred to as the "**Controller**"), as a personal data controller within the meaning of Art. 4 paragraph 7 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Regulation on the protection of personal data (hereafter referred to as "**GDPR**"), in accordance with the Article 13 of the GDPR provides the concerned data subjects (also referred to as the "**DS**") with following information:

The administrator processes **image record** through the CCTV system, which is a personal data (hereinafter also referred to as "PD"). The image record is processed when the DS moves in the monitored area.

The monitored area all premises of the Controller, i.e. the facility in the cadastral area Hlubočepy, v cadastral area Malá Chuchle and in the cadastral area Hostivař. Cameras record continuously. The monitored area is marked with information tables.

If the DS does not want his / her image record to be captured in the CCTV system, he / she must not enter the monitored area.

The **purpose of processing** the image record is the **protection of the property** owned by the Controller and the **safety of the persons** moving within the monitored premises.

In the case of an image record, it is not a processing of special categories of PD (sensitive data) within the meaning of Art. 9 paragraph 1 of the GDPR. Basically, it is the visual identification of a person in connection with a particular behavior. With help of the CCTV system, the Controller will be able to identify a record that would capture e.g. a criminal offense, regardless of nationality, race, ethnic origin, religion or medical conditions of the person recorded on that record or regardless the biometric characteristics of that person. The processing of a special categories of PD would occur if the storage and / or comparing of some biometric characteristics of the data subject (facial features/markers, biometric walking characteristics, facial recognition, etc.)<sup>1</sup> take place during the recording or processing of the image record.

The PD are processed by the Controller and stored in the image record **within a time loop for a period of 10 days**, with the exception being a CCTV system which has the automatic parking pay machines in its viewing angle; i.e. they are processed by the Controller and stored in the image record within a time loop for a period of 30 days due to a contractual arrangement with a bank that processes payments through cashless payment terminals.

In the event that the image record does not capture such behavior so as to make it necessary for the purpose of the legitimate interest of the Controller, the DS, a third party or the public interest to have this record as evidence, the image record will be automatically deleted after the lapse of specified period of time in overwrite. In the event that the image record captures such behavior, the image record will be kept for the time necessary to protect the legitimate interest of the Controller, the DS, a third party, or the public interest.

**No automated decision making, including profiling, will take place** when processing the image record. The image record will be processed exclusively by the Controller's employees or by the person who process the personal data for the Controller on the grounds of the contract concluded with the Controller. The image record will be provided to other recipients only if it will be necessary to use the CCTV record as an evidence to protect the legitimate interest of the Controller, DS, a third party or the public interest. In such a case, it would be provided, for example, to the Police of the Czech Republic, to a court or other public administration, or to another authorized entity.

In connection with the PD protection under the GDPR, the DS has following rights:

### **Right of access to PD**

According to Article 15 of the GDPR the DS has the right to obtain, upon request from the Controller, a confirmation of whether or not are PD processed. In case the PD are processed, the DS has the right to notification about: the purpose and extent of their processing, the possible recipients to whom the PD has been or will be made available, the period during which the PD will be stored by the Controller, the possibility of exercising the right to request correction from the Controller, erasure of his / her PD or restriction of their processing, the right to object to the

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<sup>1</sup> Operation of CCTV systems: Methodology for fulfilling the basic obligations imposed by the Personal Data Protection Act prepared by the Office for Personal Data Protection.

processing of the PD and the right to lodge a complaint with the Office of Protection of the Personal Data. The DS has the right to receive all available information about the source from which the PD has been obtained and the information on whether the automatic decision-making, including profiling is made on the ground of PD processing.

In the case of the DS's image record processing, the exercising of this right will be possible only to a limited extent, as the individual image record is not usually associated with a particular DS.

#### **Right to correct inaccurate data**

According to article 16 of the GDPR the DS has the right to correct inaccurate personal data, as well as to complete the incomplete personal data, which concerns the DS. However, in the case of an image record, the exercising of this right is not objectively possible.

#### **Right to erasure of personal data**

According to article 17 of the GDPR the DS has the right to erase personal data if the PD are no longer needed for the purpose of fulfilling the lease agreement, if the DS objects to the processing of the PD due to a particular situation and there is no overriding justified reason for processing the PD. The DS has also the right to erasure of personal data if the PD are unlawfully processed or if PD has to be erased in order to fulfill the legal obligation that applies to the Controller.

With regard to the method of processing the image record and the length of time the image record is stored, the exercising of this right will be possible only to a limited extent.

#### **Right to restrict the processing of personal data**

According to article 18 of the GDPR the DS has the right to restrict the processing of the PD, i.e. in particular the right to transfer the data to another system and their non-accessibility to the public, and by the relevant data the right to indicate that they are subject to restrictions, provided that the DS denies the accuracy of the PD, for a period enabling the Controller to verify the accuracy of the personal data, the processing is unlawful and the DS opposes the erasure of the PD and requests the restriction of their use instead, the Controller no longer needs the PD for the purpose of the fulfillment of lease agreement, but the PD are required for the establishment, exercise or defense of legal claims or if DS has objected to processing due to particular situation and PD are processed for the purpose of their necessity for the legitimate interests of the Controller or third party, pending the verification whether the legitimate grounds of the Controller override those of the DS.

Where PD processing has been restricted in the above mentioned manner, the Controller is entitled to process PD, with the exception of storage, only with the DS's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or of a Member State.

With regard to the method of processing the image record and the length of time the image record is stored, the exercising of this right will be possible only to a limited extent.

#### **Right to data portability**

According to article 20 of the GDPR the DS shall have the right to receive from the Controller his / her PD, which the DS has provided to the Controller for the purpose of fulfillment of lease agreement, in a structured, commonly used and machine-readable format and to ask their transmission to another controller if the PD processing was carried out by automated means and this transmission was technically feasible.

With regard to the length of time the image record is stored, the exercising of this right will be possible only to a limited extent.

#### **Right to object to the processing of PD**

According to article 21 of the GDPR the DS has the right to object to the processing of the PD on grounds relating to his or her particular situation, if the PD were processed for the purposes of the legitimate interests of the Controller or a third party. Submission of an objection will cause that the Controller shall no longer process the PD unless the Controller demonstrates that the Controller's interest (legitimate grounds for the processing) override the basic rights and freedoms of the DS.

With regard to the blanket monitoring of the premises with CCTV system, the exercising of this right will be possible only to a limited extent.

**The right not to be subject to any decision based on automated processing, including profiling.**

According to article 22 of the GDPR the DS has the right not to be subject to a decision based on automated processing, including profiling. However, in the case of PD provided to the Controller, such decision-making will not occur.

**Right to lodge a complaint with a supervisory authority**

According to article 77 of the GDPR the DS has the right to lodge a complaint with the supervisory authority, i.e. with the Office of Protection of the Personal Data, if the DS considers that the GDPR has been violated in connection with the processing of his / her PD.

DS is entitled to exercise all the aforementioned rights by the Controller either by sending a letter to the address of its registered office to the attention of the statutory body or by e-mail to the address: [recepce@barrandov.cz](mailto:recepce@barrandov.cz).

The Controller is obliged to respond to the request of the DS in connection with aforementioned rights without undue delay after the request is received, however not later than 1 month after the receipt of the request.