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## **MONITORING POLICY BINDING IN BUILDINGS, WHICH BELONG TO WOLF IMMOBILIEN POLEN S.A.**

### **Information for a person, whose data might be registered by the monitoring**

1. Monitoring is carried out by Wolf Immobilien Polen S.A. seated in Warsaw, address: Próźna 5/5 based on legally justified interests exercised by the administrator to ensure safety and public order and protection of property and persons.
2. The building marked with information about the monitoring and its nearest vicinity is monitored and the reach of cameras covers: entry to the building, communication areas, commercial areas, service areas, a part of office areas and a garage and the nearest vicinity of the building.
3. Social rooms and toilets are not subject to video supervision.
4. Entering the area covered with monitoring is a voluntary action.
5. Monitoring data may be provided to competent authorities responsible for ensuring safety and public order as well as persons authorized by Wolf Immobilien Polen S.A. and processing persons and entities, providing services to the company: security of property and persons, services.
6. Proper technical and organizational measures have been implemented so that the data processing is in compliance with law, they are permanently analyzed and improved.
7. You are entitled to claim access to your information, adjust it, remove or restrict its processing and you are entitled to object against this processing. You are also entitled to make a complaint to the supervisory authority.
8. We store the monitoring recordings for 21 days, we do not apply an automated decision making.
9. If you want to exercise your rights please send information with a case description to the e-mail address: [wolfimmobilien@wolfimmobilien.pl](mailto:wolfimmobilien@wolfimmobilien.pl) or report the case by the phone: 22 436 37 16.

### **Rules of video supervision**

1. Wolf Immobilien Polen S.A., when establishing the rules of video supervision, undertakes actions to protect personal data in accordance with the Disposition of the European Parliament and Council (UE) 2016/679 of 27 April 2016 on the protection of natural persons in connection with the processing of personal data and free flow of such data (RODO or GDPR).
2. The purpose of these actions is the protection of privacy and other basic rights and justified interests of persons, whose images have been registered.
3. Location of cameras - the cameras monitor entries and exits of the building, communication paths including lifts and staircases and a garage and the nearest vicinity of the building, including the drive to the garage.
4. We do our best not to monitor areas subject to increased expectations in the scope of privacy such as offices, social rooms, resting places, toilets.
5. Exceptionally, some office spaces are subject to video supervision and such areas are marked at the entry.
6. The location of cameras has been checked precisely to minimize the monitoring of the areas, which are not relevant to secure safety.

### **Handling the monitoring data**

1. Wolf Immobilien Polen S.A. does its best to secure properly the data coming from the video supervision against unauthorized access, loss, unauthorized modification. Physical security measures of the IT infrastructure serve this purpose, as well as the service care concerning the devices and trusted and trained system service team. Proper organizational

procedures have been implemented for keeping safety and data confidentiality and issuing authorizations and limiting the access rights to data and processing actions.

2. The video supervision system saves the camera recordings. The recordings are saved for 21 days.

3. In case if there is an occurrence of an incident connected with safety of persons or property and competent services or persons apply to Wolf Immobilien Polen S.A. with a request of safety and access to recordings, the indicated data (the date, time and place should be pointed out as precisely as possible) will be secured until explanation whether the request is reasonable and authorized or until explaining of the proceedings connected with the incident. Data securing means that they may be stored for more than 21 days.

4. Camera recordings are not publicized in the Internet or in any other form.

### **Providing access to monitoring data**

1. Access to monitoring data of Wolf Immobilien Polen S.A. may be provided to processing persons and entities, with whom relevant agreements were signed to ensure confidentiality and safety of data. Every person, who has any type of access to the data of the monitoring system, even if it refers only to access to devices for service purposes, has a proper authorization and is obliged to keep confidentiality.

2. Providing the monitoring data to services responsible for ensuring safety and public order, happens only in response to a written request of competent authorities.

3. Specific situations justifying the provision of data to other entities (data receivers):

- incident connected with safety or occurrence of a damage on the part of Wolf Immobilien Polen S.A.;
- obligation to secure and to provide to competent authorities the monitoring data, based on the provisions of law;
- exercising the right of access to data or right to copies of data by a person, whose image was saved;
- exercising of a court decision concerning providing data from monitoring.

### **Exercising the rights of persons registered by monitoring**

1. If your image was saved in the monitoring system, you are entitled to request access to your data, to obtain copies of data, to adjust the data, remove them or restrict processing of them and you have the right to object against the processing. These rights result from the RODO (GDPR) regulations and may be called as rights to information and access to data.

2. Wolf Immobilien Polen S.A. always does its best to respect and exercise the rights of persons, whose image might have been registered by the monitoring system, that is why we verify the following information:

- are we able to identify the person, who wants to use his or her right to information and access to data;
- do these data exist (or maybe they have already been deleted);
- are we able to verify the identity of the person, who wants to use their rights to information and access to data (we must not make a mistake, we must be sure that we provide information and data to a proper person or we delete the data of a proper person);
- do we respect all rights of other persons, whose image is in the recordings;
- in the existing situation, do we have technical possibilities to provide information or data, is it possible to delete a particular person's data.

3. Having analyzed answers the these questions, a authorized and trained employee shall provide to you the proper information and data or explain why we cannot provide them.

4. The first use of the right to information an access to data is free of charge, but if such requests are presented permanently and without justification, we are entitled to collect a charge or refuse to take action, such rights result from RODO (GDPR).

5. The right to adjust the data may concern situations, when in effect of an incident or other events, it will be necessary to make a note or a protocol by a security employee. If a note or a protocol contains data referring to a person registered by the monitoring system and this person states that they are described inappropriately or misinterpreted, and therefore they are incorrect, this person is entitled to adjust the data, for example by presenting a statement. A security employee is obliged to accept such a statement and protocol this fact.

6. You are also entitled to file a complaint to a supervisory authority - the President of the Office of Protection of Personal Data, relevant information may be found on the website of the office.

7. If you want to exercise your rights please send information with a case description to the e-mail address: [wolfimmobilien@wolfimmobilien.pl](mailto:wolfimmobilien@wolfimmobilien.pl) or report the case by the phone: 22 436 37 16.