

**SPECIAL NOTICE**  
**ON THE PROCESSING OF PERSONAL DATA**  
**THROUGH VIDEO SURVEILLANCE SYSTEM (CCTV)**

- 1. Data Controller:** The company "Pharmassist Sole Shareholder Limited Liability Company" under the trade name "PHARMASSIST LTD", with principal offices located at 15 Anthrakorichon str, Nea Ionia, Attica, GR 14235, email: [dataprotection@pharmassist-cro.com](mailto:dataprotection@pharmassist-cro.com), telephone number: 2106560700, website: <https://www.pharmassist-cro.com> For any questions or concerns regarding personal data protection, you may also contact our Data Protection Officer, mr. Ioannis Baveas at 137 Vasilissis Sofias str, Athens, GR 11521, email: [dataprotection@pharmassist-cro.com](mailto:dataprotection@pharmassist-cro.com) and/or [ibaveas@bprlaw.gr](mailto:ibaveas@bprlaw.gr), telephone number: 2103644286
- 2. Purpose of Processing and Legal Basis:** We use a video surveillance system/closed-circuit television (CCTV) in order to protect premises, people/natural persons and goods, especially due to the handling of sensitive and high-value data and assets. The processing is necessary for the purposes of the legitimate interests we pursue as a data controller [Article 6(1)(f) GDPR].
- 3. Analysis of Legitimate Interests:** Our legitimate interest lies in the need to protect our premises and assets against illegal actions, such as theft. We also need to ensure life safety, physical integrity, health, as well as the property of our staff and third parties lawfully located in the monitored area. We only collect image data (not audio) and limit the surveillance to areas where we have assessed an increased possibility of illegal actions (e.g. theft), such as in common entrance areas and spaces where our data is stored, without focusing on areas where privacy of the persons captured by the CCTV may be excessively compromised, including their right to respect of their personal data. The camera angles are such that they focus as little as possible on the faces of employees and passers-by and we prefer broader range recordings.
- 4. Recipients:** The recorded material is accessible only by our competent/authorized personnel or external partners in charge of securing the premises and managing the video surveillance system. This material is not shared with third parties, except in the following cases: a) to competent judicial, prosecutorial and police authorities, when it contains information necessary to investigate a criminal offense involving persons or assets of the data controller; b) to competent judicial, prosecutorial, and police authorities, when lawfully requesting data in the performance of their duties; c) to the victim or the perpetrator of a criminal offense, in case of data which may constitute evidence of the offense.
- 5. Retention Period:** We keep the data for maximum fifteen (15) working days, following which, it is automatically deleted. If during this period an incident occurs, we isolate part of the video and keep it for up to one (1) additional month for investigation purposes and for initiating legal proceedings to defend our legitimate interests. If the incident involves a third party, we shall

retain the video for up to three (3) more months. Appropriate technical and organizational measures are in place to protect the data especially from unauthorized access or disclosure.

**6. Rights of Data Subjects:** Data subjects have the following rights:

- Right of **access**: You have the right to know if we process your image, and if so, to receive a copy of it.
- Right to **restriction**: You have the right to request that we restrict processing, such as not deleting data you deem necessary for establishing, exercising, or supporting legal claims.
- Right to **object**: You have the right to object to the processing of your data.
- Right to **erasure**: You have the right to request that we delete your data.

You may exercise your rights by sending an email to [dataprotection@pharmassist-cro.com](mailto:dataprotection@pharmassist-cro.com) or by sending a letter to the postal address provided above, or by submitting your request in person to the same postal address. To examine a request related to your image, you should specify approximately when you were within the range of the cameras and provide an image of yourself to assist in identifying your data and in hiding the data of third parties captured in the footage. Alternatively, we give you the opportunity to visit our premises to view the footage in which you appear. Please note that exercising the right to object or erasure does not result in the immediate deletion of data or modification of the processing. In any case, we will respond to your request within one month of receiving it, or if necessary, we will inform you of any delays in processing your request.

- 7. Right to Lodge a Complaint:** If you believe that the processing of your personal data violates the GDPR [Regulation (EU) 2016/679], you have the right to lodge a complaint with a supervisory authority. The competent supervisory authority in Greece is the Hellenic Data Protection Authority, 1 -3 Kifisias Avenue, 11523, Athens, <https://www.dpa.gr/>, tel. 2106475600. The complaint can be submitted through the Authority's online portal: <https://www.dpa.gr/el/syndesi/prosvasi>, and detailed information on how to file a complaint is provided at the following link: [https://www.dpa.gr/el/polites/katagelia\\_stin\\_arxi](https://www.dpa.gr/el/polites/katagelia_stin_arxi).