

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, Official Journal of the European Union L 119/1) and Act on Implementation of the General Data Protection Regulation („Official Gazette“, number 42/2018), the company Tehnomont d.d., with registered office in Pula, Industrijska 4, personal identification number (*OIB*): 30999020365, as Personal Data Controller, represented by the Chair of the Board of Tehnomont d.d., upon prior consent of the Works Council of Tehnomont d.d. of 14 May 2018 pursuant to Article 151, Paragraph 1, Item 7 of the Labour Act („Official Gazette“ 93/14 and 127/17), adopted on 15 May 2018 the following

RULES FOR THE USE AND IMPLEMENTATION OF VIDEO SURVEILLANCE

Article 1

The Rules for the Use and Implementation of Video Surveillance in the company Tehnomont d.d. (hereinafter referred to as "Rules") determine the purpose and scope of data collection; the method of storage, the retention period and the use of recorded images; the protection of the rights of employees and all other people present at the premises of the company Tehnomont d.d. as Personal Data Controller.

Article 2

The Rules are appropriately implemented in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, Official Journal of the European Union L 119/1), Act on Implementation of the General Data Protection Regulation („Official Gazette“, number 42/2018), and all rules and regulations governing personal data protection and the implementation of technical security systems.

Article 3

(1) The video surveillance system is used to ensure the security of employees and all other people present on the premises owned by the company Tehnomont d.d. as well as on the premises for which the company Tehnomont d.d., as Personal Data Controller, has got a concession agreement in place for commercial use of the special purpose port – Marina Veruda.

(2) In addition to the purposes specified in Paragraph 1 of this Article, the video surveillance system is used to prevent illegal actions against the property of the company Tehnomont d.d., i.e. theft, robbery, burglary, violence, damage, destruction and the like.

(3) Video surveillance footage may only be used for the purposes specified in Paragraphs 1 and 2 of this Article and may not be used for other purposes.

Article 4

(1) The video surveillance system records only the areas belonging to the company Tehnomont d.d., including the factory area, the parking lot and the production plant at the location Industrijska 4, as well as the premises of Marina Veruda at the address Cesta prekomorskih brigada 12, including the area covered by the Concession Agreement for Commercial Use of the Special Purpose Port – Marina Veruda, especially the piers, parking lots, dry berths, the service shop, and the reception/exchange office.

(2) The data is recorded and stored on the video recorder for a maximum of six months from the date it was recorded, after which time such footage will be permanently deleted.

(3) If a video recording is reasonably needed as evidence, the company Tehnomont d.d. as Personal Data Controller may decide, in each particular case, to store the video footage for a longer period than the period specified in Paragraph 2 of this Article, in the manner and for a maximum period as specified in Paragraph 4 of this Article.

(4) The recordings to be used as evidence of violation of a monitoring objective will be stored on an optical disc (CD, DVD or the like) for a period of one year i.e. until the completion of the relevant judicial, administrative, arbitration or other equivalent proceedings.

Article 5

(1) The company Tehnomont d.d. as Personal Data Controller is obligated to display an easily visible notice at the entrance to the premises, as well as in the premises, providing information that the space is under video surveillance. Employees will be informed in writing about the introduction of video surveillance. The written notification will include information about what is recorded, the reasons for surveillance and the information on how long the personal data will be stored.

(2) The notice about the space being recorded by a surveillance camera or another recording system, provided by the company Tehnomont d.d. as Personal Data Controller, must be easily visible, with the appropriate camera symbol and a text providing information about the identity of the Controller and/or the Processor and the contact details where a data subject can exercise his/her rights.

Article 6

(1) Video surveillance footage is protected by professional secrecy and processed in accordance with the Rules for Personal data Protection and these Rules.

(2) The authorised person within the company Tehnomont d.d., as Personal Data Controller, and the authorised Processor have direct access to video surveillance cameras as well as remote access over the internet. Access is protected by a password.

Article 7

The authorised persons within the company Tehnomont d.d., as Personal Data Controller, and the Processor have to keep records from which it can subsequently be established when certain personal data from the video surveillance system were used or otherwise processed (copying) and who did it.

Article 8

Only the authorised persons within the company Tehnomont d.d., as Personal Data Controller, and the Processor have access to the archives of video surveillance footage and the right to view the recorded images.

Article 9

(1) The Board of the company Tehnomont d.d., as Personal Data Controller, and the Processor are responsible for making decisions about allowing access to other people as well as about transporting and storing the footage material on portable storage devices.

(2) Recordings of specific incidents, which the Board of the company Tehnomont d.d., as Personal Data Controller, the authorised persons within the Personal Data Controller and the Processor consider necessary and appropriate to be retained as evidence in complaint, damage compensation, disciplinary or criminal proceedings, will be stored on portable storage devices.

(3) The Board of the company Tehnomont d.d. as Personal Data Controller may determine that recordings of certain extraordinary events may be stored on portable storage devices for the purposes of reconstruction and analysis of security implementation. The recording on portable storage devices is carried out by an authorised employee.

(4) The portable storage devices on which the images are recorded must be sited in a secure location at the company's premises.

Article 10

(1) If the footage of a specific event or situation raise suspicion of a criminal offence, such suspicion should be reported to the police. The recorded images will be produced in writing or on a portable storage device on the request of the police or another competent authority.

(2) The transfer of a copy of the footage will be recorded in the specific records of personal data processing activities.

Article 11

(1) The Processor with whom the company Tehnomont d.d. has a contractual agreement takes care of the implementation of video surveillance and the maintenance of monitoring hardware and software, in accordance with the applicable legislation.

(2) The video surveillance system must meet the following technical requirements:

- system settings are accessible only with a special password;
- all activity on video footage (viewing, copying, deletion) is monitored using the following parameters:
 - the time when the relevant active user accessed the video surveillance system, the time of his/her arrival, what footage he/she used (number of cameras for recording the period from - to);
- automatic deletion of old footage according to the indicated time of recording;
- impossibility of sending footage via the computer network (except for the location of the contractor and/or authorised employee in a remote location);
- only the Personal Data Controller, i.e. the Processor with prior consent of the Controller, is

allowed to transport video footage on portable storage devices.

Article 12

(1) Neither the authorised persons within the company Tehnomont d.d., as Personal Data Controller, nor the Processor nor any other person may use the personal data captured by the video surveillance system beyond their lawful purpose, and only the Personal Data Controller, the Processor, i.e. their authorised persons are allowed to dispose of the video footage.

(2) The company Tehnomont d.d., as Personal Data Controller, will issue a decision to designate a person authorised to access and process personal data captured by the video surveillance system.

Article 13

These Rules may be amended in the same manner and following the same procedure as when they were originally made and adopted.

Article 14

These Rules will become effective and applicable 8 (eight) days after their publication on the bulletin board and on the website of the Personal Data Controller.

Tehnomont d.d.
Chair of the Board
Gordana Deranja