

ON THE USE OF VIDEO SURVEILLANCE SYSTEMS AT ZEAD BULSTRAD VIENNA INSURANCE GROUP

CHAPTER ONE

GENERAL PROVISIONS

Art. 1 These internal rules regulate the general procedure and organization in the use of video surveillance, also called CCTV, systems at the premises of ZEAD BULSTRAD VIENNA INSURANCE GROUP /the Company/ for the purpose of protecting the property of the Company and ensuring the maximum security of employees and visitors at the premises of the Company.

Art. 2 These rules determine the procedures to be observed in personal data processing related to the use of CCTV systems by the Company.

Art. 3 (1) The Company uses CCTV systems in accordance with Regulation (EU) 2016/679 of the European Parliament, as well as the legislation of the Republic of Bulgaria.

(2) The provisions of these rules are mandatory for all employees and visitors at the premises of the Company.

(3) In relation to the use of CCTV systems, the Company has conducted an impact assessment and a legitimate interest balancing test in order to determine the extent to which the privacy of the Company's visitors, employees and customers are affected.

(4) The Company maintains a register of the data processing activity performed by CCTV systems.

Art. 4 The access control regime at the Company's premises is organized in accordance with the Regulations on the access control regime at the premises of ZEAD BULSTRAD VIENNA INSURANCE GROUP.

4.1 Depending on the organized security system where a security services agreement has been concluded with an external company, the access control regime is organized through the security plan for the premises and the instructions about the duties and activity of security guards;

4.2 Where no security services agreement is concluded with an external company, the access control regime is organized through specified employees and the Heads of the General Agencies of the Company.

Art. 5 (1) For the purposes of these internal rules, the following access areas at the premises of the company have been defined:

1. Public access spaces and lobbies at the premises of ZEAD BULSTRAD VIENNA INSURANCE GROUP;
2. Restricted access areas.

(2) The areas under it. 1 of the paragraph above are freely accessible for visitors, employees and clients of the Company;

(3) The area under it. 2 of the paragraph above can be accessed only by employees with special access or with an express permission from an Executive Director of the Company.

CHAPTER TWO

PERSONAL DATA PROCESSING, DATA SUBJECT RIGHTS AND STORAGE PERIOD

Art. 6 (1) CCTV systems are used to record the digital images captured by the cameras in the monitored areas, together with the time, date and location. CCTV cameras are stationary and operate without interruption.

Art. 7 (1) ZEAD BULSTRAD VIENNA INSURANCE GROUP uses the CCTV systems for the purpose of safety and security provision, protection of the life and well-being of employees and visitors in the buildings, crime

prevention and detection, as well as protection of the Company's property.

(2) When necessary, the video surveillance supplements the other physical security systems, such as the access control systems and the physical intrusion control systems.

(3) The system shall not be used for any other purpose, such as monitoring the performance of employees or other staff or keeping track of employee presence. The system shall be used as an investigative tool or evidence in the course of internal investigations or disciplinary procedures exclusively for the purpose of investigating a physical security incident or in exceptional cases in the context of a criminal investigation.

Art. 8 The legal ground for the use of CCTV systems is the legitimate interest of the Company, including in its capacity of an employer.

Art. 9 (1) The access to the CCTV systems shall be restricted to specifically determined persons, employees of the company providing the security for the respective premises. Upon request, access to the CCTV systems may be provided also to specific employees of the Company. An Order is issued to define the persons who have rights:

- to watch real-time footage from CCTV cameras;
- to view the recordings;
- to copy, download, delete or modify a recording. The Company also provides a possibility to employee representatives to take part in the viewing of recordings too.

(2) Management or employees in the field of human resources are not granted such access, except as a part of disciplinary procedures opened directly as a result of a physical security incident. If necessary for the purposes of an investigation or prosecution of a criminal offence, access may be granted to law enforcement authorities.

(3) All breaches of security related to CCTV systems shall be recorded in a register of breaches and promptly reported to the Data Protection Officer.

Art. 10 To protect the security of CCTV systems, including the personal data involved, the following technical and organizational measures have been installed:

- The records are produced and stored in secure premises, protected by physical security measures and technical means;
- The administrative measures include an obligation for performing an individual trustworthiness check of all hired subcontractors with access to the system (including the staff for maintenance of the systems and equipment);
- All employees (external and internal) shall sign non-disclosure and confidentiality agreements;
- The Data Protection Officer shall be consulted prior to any acquisition or installment of a new video security system.

Art. 11 (1) The storage period for the data in the records from CCTV systems is not more than 60 days. With the expiration of this period, the images are deleted in the same order they have been recorded in the systems.

(2) In case of a security related incident, the respective record can be stored for longer than the standard period, as may be necessary for further investigation of the incident. Retention of the record shall be strictly documented and the need to keep it reviewed periodically.

Art. 12 The Company applies multiple public awareness measures which include the following:

- detailed notices with information about the use of video surveillance systems are placed at each entrance of the video surveillance areas of the Company;
- the policy regulating video surveillance use may be found at each office of the Company, as well as at the website: www.bulstrad.bg.

Art. 13 (1) Subject to the provisions of the Bulgarian law, data subjects have the following rights regarding their personal data processed for the purposes of the video surveillance system:

1. To access their personal data processed by the Company and receive a copy of them, as well as a right to rectify and supplement such data;
2. To request the erasure of their personal data, when the preconditions

for this are met. In the cases stipulated by law – to request restriction of the processing of their personal data.

(2) Detailed information on the conditions and procedure for exercise of these rights by individuals can be found in the Rules on the exercising of the rights of data subjects at ZEAD BULSTRAD VIENNA INSURANCE GROUP, available on the website: www.bulstrad.bg, and also at any company office in the country.

(3) All data subjects have the right to lodge a complaint with the Commission for Personal Data Protection, when the respective preconditions for this are met.

These rules have been approved with Minutes No. 4 of 11.02.2019 of the Management Board of the Company.