

THE POLICY OF USING PERSONAL DATA BY USING THE VIDEO SURVEILLANCE SYSTEM

1. The purpose of video processing

Our society, TOP TURISM INTERMED SRL, works and uses personal data, and more precisely images, using our video system, with the purpose of ensuring the security of the people within the hotel, and in order to protect the goods and premises. This is done while respecting our obligations as a data operator, which come according to the EU Regulation nr 679/2016. This policy concerning the video surveillance describes the video system of our society and the protection measures for our guests concerning the use of personal data and the free circulation of this data.

2. Short description

The society TOP TURISM INTERMED SRL Slatina has a video surveillance system comprised of two sub-systems: one sub-system comprising the surveillance cameras inside the Hotel Boulevard and one sub-system comprising the cameras from outside the Hotel.

3. Legitimacy conditions

The usage of personal data through video surveillance, the installation and usage of video surveillance equipment is done according to the legal provisions:

- The law nr 333/2003, concerning the protection of premises, goods, values as well as the protection of persons, republished, with the subsequent modifications and completions, which represent the legal basis according to art. 6, paragraph (1), letters (c) and (f) from the EU regulations nb 679/2016;
- The methodological norms of application of the law nb. 333/2003, approved through Government Decision (GD) nb. 301/2012, with the subsequent modifications and completions;
- The EU regulation nb 679/2016 related to the protection of the people in relation to the use of personal data and the free circulation of this data and to the cancellation of the 95/46/CE Directive (General Regulations Regarding Data Protection - GRDP)
- The Law nb 190/2018 concerning application measures of the Regulation (EU) nb 679/2016 of the European Parliament and of the Council from April 27 2016 concerning the protection of physical persons related to the usage of personal data and to the free circulation of these data and the cancellation of the Directive 95/46/CE (General Regulations on Data Protection).

4. Monitored areas

The placement of the surveillance cameras has been carried out in accordance with the legislation in force.

The areas where there is a high level of expectations regarding the private life (offices, toilets and other similar venues) are not monitored.

The following areas are video surveilled :

- acces areas and the parking lots designed to be used by the employees cars, tourists cars and client cars.

- the access areas from the hotel reception.

the serving area from the bar.

- the serving area from the breakfast

The placement of the surveillance cameras has been carefully revised to limit as much as possible the monitoring of the areas that do not present any interest for aim pursued.

The surveillance cameras are placed in well protected spaces, insured and locked properly, to eliminate the possibility of removing the storage media or device, especially during an event occurrence.

TOP TOURISM S.R.L. Company has the following configuration of the surveillance system:

4.1. For outdoor areas – hotel parking, area outside the restaurant, inner courtyard (supply area)-a number of 8 surveillance cameras;

4.2. Inside the hotel – lobby of reception, Bar, breakfast area-a number of 8 surveillance cameras.

5. Transparency and information

The TOP TOURISM S.R.L. Company provides to the persons that enter the video-supervised areas, the information provided by art. 13 of the General Data Protection Regulation (GDPR). In this respect, the information provided for in article 13 The GDPR, with its accompanying icon, is brought to the attention of the data subjects in a clear and permanent manner, by means of an "information note" poster posted in the area of access of the monitored places, positioned at a reasonable distance from the place where Surveillance equipment is located so that it can be seen by any person.

6. The protection of privacy and information security

In order to protect the security of the video system and to enhance the protection of privacy, the following technical and organisational measures have been introduced:

-Surveillance cameras cannot directly identify the concerned person;

-Limiting the storage time of the filmed material in accordance with current legal requirements to a maximum of 30 days;

-Storage media (digital video recorders) are protected by physical security measures;

-All users with access rights have signed the post sheet obliging them to comply with the legal provisions in the field of personal data processing and have signed a commitment to preserve confidentiality;

-The right of access shall be granted to users only for those resources which are strictly necessary for the performance of the duties of service;

-The personal Data protection officer will be consulted before installing any new video system.

At the same time, measures have been taken to prevent the unlawful processing of personal data or unauthorised access to those data .

7. Access to personal data collected through the video surveillance system

Access to recorded and live video footage is limited to a small number of people (which can be clearly identified and determined by the tasks specified in the job description (for what purpose and what type of access)).

Access to the filmed material and/or the technical architecture of the video system is limited to a small number of persons who can be clearly identified and determined by the tasks specified in the job description (for what purpose and what type of access).

All persons involved in the video surveillance activity and those responsible for administering the filmed images will have access to records in compliance with the purpose limitation principle and only for the performance of the service tasks.

TOP TOURISM S.R.L. imposes limits on persons entitled to copy, download, erase or modify any footage.

All staff with the right of access to video recordings receive initial data protection training. Training is provided to each new staff member, and that periodic training on data protection topics is organised at least every two years for all staff members who have the right to access data.

The video surveillance system is not used for verifying the presence of the program or evaluating performance at the workplace.

In exceptional cases, but respecting the guarantees described above, the access to the Disciplinary Research Committee designated by the General Director of the TOP TOURISM company S.R.L. may be granted, in the context of disciplinary inquiries or in the case of research into the circumstances which led to the injury of the data subject when an OSH event is investigated, provided that the information helps to investigate a criminal offence or misconduct liable to harm a person's rights and freedoms.

Any breach of security in respect of video surveillance shall be submitted to the data protection officer who is informed of this as soon as possible.

8.8. Disclosure of personal data collected through the video surveillance system

The information recorded through video surveillance systems is intended for use by the TOP TOURISM S.R.L. Company for the purpose of monitoring the access of persons in the hotel, ensuring the security of the hotel's premises and property, as well as the safety of persons in the hotel and shall be made available to the judicial bodies and other institutions empowered by law to request such information at their express request.

Any transfer and disclosure of personal data to third parties shall be documented and subject to a rigorous assessment of the need for communication and compatibility between the purpose for which the communication is made and the purpose for which such data have been initially collected for processing (security and access control). In these cases the Data protection officer designated at the data controller level will also be consulted.

Any disclosure situation will be recorded by the system administrator in the record of disclosure cases.

Your personal data processed through the use of video surveillance means will NOT be transferred abroad.

9. The storage period

The duration of storage of data obtained through the video surveillance system shall be proportionate to the purpose for which the data is processed, so that the images are stored for a period not exceeding 30 days, except in express situations regulated by law or duly justified cases.

When the storage period expires, the data is deleted by automatic procedure in the order in which they were posted.

In the event of a security incident, as well as in duly justified cases, the retention time of the relevant filmed material may exceed the normal limits depending on whether the security incident is required to be further investigated.

The retention is rigorously documented and the need for retention is periodically reviewed (every two months).

If the storage time exceeds the 30-day period, it will be recorded in the register of records exceeding the storage time managed by the system administrator.

10. The rights of the subject person

TOP TOURISM S.R.L. Guarantees that the company is in compliance with the rights of the data subjects under Regulation No. 679/2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

The primary information of the data subjects shall be carried out clearly and permanently by means of an appropriate sign, with enough visibility and located in the supervised area, so as to signal the existence of the surveillance cameras and to communicate the essential information concerning the processing of personal data.

10.1 .Exercise of access, intervention and opposition rights

During the entire period of storage of personal data, data subjects have the right of access to personal data concerning them held by the TOP TOURISM S.R.L. Company, to request intervention (deletion/updating/rectification/anonymisation) or to oppose processing, according to the law.

Any request for access, rectification, blocking and/or deletion of personal data as a result of the use of the cameras should be addressed to the company TOP TURISM S.R.L.

The answer to the request for access, intervention or opposition shall be given within 30 calendar days, if this time limit cannot be complied with, the data subject shall be informed about the reason for postponing the answer, and also the procedure to be followed for resolving the application shall be communicated.

If there is an express request from the data subject, he/she is granted the right to view the recorded images concerning him or her and a copy of those images can also be sent to him/her. The images provided will be clear, as far as possible, provided that the rights of third parties are not prejudiced (the data subject will only be able to view their own image, the images of other persons who may appear in the registration will be edited so that they are not possible to recognize/identify them). In case of such a request, the data subject shall be obliged to identify beyond any suspicion (to present the identity document when participating in the viewing), to indicate the date, time, location and circumstances in which the security cameras were registered. The data subject will also present a recent photograph so that the designated users can easily identify it in the film-coated images. The person will only be able to view their own image, images of people who may appear in the record will be edited so that they are not possible to recognize/identify them.

There is a possibility of refusing the right of access where the exceptions laid down by law apply. The need to restrict access may also be required if there is an obligation to protect the rights and freedoms of third parties, for example if other people appear in pictures and there is no possibility of obtaining their consent or may not be extracted by editing the images, non-material personal data.

For the exercise of the above mentioned rights, the data subject must submit a written application, dated and signed at the following address :

Address: Company TOP TOURISM S.R.L., Bulevardul A.I. Cuza , Nr. 12, Slatina

E-mail: dpo@bulevard-prestige.ro

Fax: 0249,415,001

or can file his/her personal request at the reception of the Hotel Bulevard Prestige.

For further information, you can contact your data protection officer at 0249,415,002 or email: dpo@bulevard-prestige.ro

We specify that the exercise of rights is free of charge for a single request once a year.

Similarly, according to Regulation (EU) No 679/2016, the data subject has the right to file a complaint (article 77) to the National supervisory Authority for the processing of personal data at its headquarter in Bucharest, Gheorghe Magheru Nr. 28-30, Sector1, postal code 0103336.

E-mail: anspdcp@dataprotection.ro or to address to the justice (art. 79).