

# Video Surveillance Policy

Video data, where a person can be identified, constitutes personal data. Captario strives for openness and transparency regarding collection and use of personal data. Therefore, we have compiled this policy for video surveillance in office areas.

## Purpose

The purpose of the video surveillance is to increase the safety and security of our employees, visitors, and contractors, and to protect our property.

This includes prevention and investigation of crimes, as well as curbing unauthorized entry and, where applicable, to assist authorities in the event of suspected or established crime.

## Regulations

From 25 May 2018, the EU data protection regulation, General Data Protection Regulation 2016/679, governs processing of personal data. The Swedish legislation in this area has been adapted to the EU regulation by Kameraövervakningslagen (the Swedish Video Surveillance Act) 2018:200.

The legal basis for processing personal data in connection with Captario's video surveillance is through the so-called balance of interests in accordance with Dataskyddsförordningen (the Swedish Data Protection Ordinance) art. 6 p. 1. f.

Captario makes the assessment that the need for video surveillance is greater than the intrusion into the personal integrity it can mean for our employees, visitors, and contractors. Our assessment regards the fact that our offices are unmanned during certain hours and that we want to ensure a safe and secure office environment.

## Obligation to inform

Information about video surveillance must be provided through clear signage or in another effective way.

At Captario, we inform our employees at on-boarding and via the intranet, and visitors through signs placed inside and outside with links to this page.

## Handling of personal data

The surveillance is in general recorded, that is, there is no live surveillance, unless an alarm has been set off. The data is stored for 1-2 weeks before deletion. The only exception are needs for compliance with legal requirements, or to protect legal interests, for example if there is an ongoing legal process.

The video surveillance concentrates on entrance areas and 'public' spaces. The recorded material will only be used according to the purposes stated above.

Only a select few have access to the data, and access is logged and controlled by password protection. The video server is located in the EU and the material is encrypted.

The data may also be processed by so-called Personal Data Processors, i.e., by companies hired regarding surveillance, security, camera systems, error reporting and customer

support. These parties may not use your personal data for any purpose other than to provide the services they have been engaged for and only on the terms we specify. The relationship between Captario (Data Controller) and each Data Processor is governed by a written contract (Data Processing Agreement) and is referenced in Captario's list of Data Processors.

According to Kameraövervakningslagen, *confidentiality* applies to what one can have learned about an individual through the recordings.

Abuse of the above could lead to claims for damages and loss of the right to use video surveillance.

### **Your rights**

You have the right to know which personal data we process about you. You also have the right to request that we correct your personal data or, unless it is necessary for the purpose stated above, delete it. In addition, you have the right to request that we limit the processing of your personal data, and the right to object to us processing your personal data. We will reply to your request without undue delay and at the latest within one month.

If you believe that we have violated the rules for the processing of personal data or have other concerns about personal data, you may contact Integritetsskyddsmyndigheten (the Swedish Authority for Privacy Protection).

### **Personal Data Controller & Contact**

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