



Notification on the processing of Personal Data through a surveillance system

1. Data Controller:

Milonas Health A.E., Irous 27, Postal code 10442, Athens, tel. +30 210 9902061

2. Purpose of processing and legal basis:

We use a surveillance system for the purpose of protecting individuals and property (Law 4624/2019, Article 27, para. f). The processing is necessary for the purposes of legitimate interests pursued by us as the data controller (Article 6, para. 1(f) of the GDPR).

3. Legitimate Interests Assessment

Our legitimate interest lies in the need to protect our premises and the assets located within them from illegal acts, such as theft. The same applies to ensuring the safety of life, physical integrity, health, and property of our staff and third parties who are lawfully present in the monitored area. We only collect image data and limit the recording to areas where we have assessed a heightened risk of illegal activity, such as theft, like our cash registers and entrances. We do not focus on areas where individuals' privacy could be excessively restricted, including their right to the protection of personal data.

4. Recipients

The stored material is accessible only to our authorized personnel responsible for the security of the premises. This material is not disclosed to third parties, except in the following cases: a) to the competent judicial, prosecutorial, and police authorities when it contains information necessary for the investigation of a criminal act involving individuals or property of the data controller; b) to the competent judicial, prosecutorial, and police authorities when they lawfully request data in the performance of their duties; and c) to the victim or perpetrator of a criminal act when it involves data that may constitute evidence of the act.

5. Retention Period

We retain the data for fifteen (15) days, after which it is automatically deleted. If we identify an incident during this period, **we isolate the relevant portion of the video** and keep it for up to one (1) additional month **for the purpose** of investigating the incident and initiating legal proceedings to protect our legitimate interests. If the incident involves a third party, we will retain the video for up to three (3) additional months.

6. Rights of Data Subjects

Data subjects have the following rights:

- **Right of Access:** You have the right to know if we are processing your image and, if so, to obtain a copy of it.



- **Right to Restriction:** You have the right to request that we restrict the processing, such as not deleting data that you consider necessary for the establishment, exercise, or defense of legal claims.
- **Right to Object:** You have the right to object to the processing.
- **Right to Deletion:** You have the right to request the deletion of your data.

You can exercise your rights by using a specific form (<https://www.milonashealth.gr/wp-content/uploads/2024/10/GDPR-FORM-07-Data-Subject-Request-Form.pdf>), sending it via email to dpo@milonashealth.gr, or mailing it to our postal address. You can also submit your request in person at the company's address. To evaluate a request related to your image, you need to specify approximately when you were within the camera's range and provide us with an image of yourself to help us identify your data and redact any data of third parties depicted. Alternatively, we offer the option for you to visit our facilities to view the images in which you appear. We also emphasize that exercising the right to object or deletion does not automatically result in the immediate deletion of data or modification of processing. In any case, we will respond to you in detail as soon as possible, within the deadlines set by the GDPR.

7. Right to lodge a complaint

If you believe that the processing of your personal data violates 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, located at Kifisias 1-3, 115 23, Athens, <https://www.dpa.gr/>, phone: 2106475600.