

VIDEO SURVEILLANCE (CCTV) PRIVACY NOTICE

1. GENERAL PROVISIONS

This privacy notice applies to persons visiting our premises and/or areas (car parks) where CCTV surveillance is carried out and personal data recorded by CCTV is processed.

Individuals are informed that video surveillance is being carried out on our premises and/or grounds (car parks) by means of special information signs.

This privacy notice contains information on what personal data is processed and for what purpose and on what legal basis, how long personal data is stored, what the rights of data subjects are, and other information required by law.

2. CONTACT DETAILS OF THE DATA CONTROLLER

Data Controller - Atlas Living UAB, legal entity code: 306104119, address: 21A Dariaus ir Girėno g., LT-02188, Vilnius, tel. +37065979777, e-mail: news@atlasliving.lt (hereinafter - the Company).

If you have any questions regarding your personal data, please contact us at: ada@aerocity.lt.

3. WHAT PERSONAL DATA ARE PROCESSED, FOR WHAT PURPOSE AND ON WHAT LEGAL BASIS?

Purpose of processing personal data (Why do we process your personal data?)	Categories of personal data (What personal data do we process?)	Legal basis for processing personal data	Storage period
Protection of the Company's and other persons' property, information on the premises and/or territory	Image and other personal data entering the field of view of the CCTV camera (location, date, time) (without audio recording)	The Company has a legitimate interest in ensuring the security of property, information and persons, preventing unlawful activities and preserving evidence for incident investigation (Article 6(1)(f) GDPR)	10 days from the date of image capture
Protecting the health and life of the Company's employees and other persons on the premises and/or territory			
Preventing, detecting and investigating illegal activities			

Purpose of processing personal data (Why do we process your personal data?)	Categories of personal data (What personal data do we process?)	Legal basis for processing personal data	Storage period
Managing legal requirements		The company's legitimate interest - to defend, pursue and enforce legal claims (Article 6(1)(f) GDPR)	Personal data will be kept until the dispute is finally resolved or the investigation is concluded

4. STORAGE PERIOD FOR PERSONAL DATA

See section 3 "Storage period" of this privacy notice.

5. SOURCES FROM WHICH WE COLLECT PERSONAL DATA

We collect personal data using technical means such as CCTV cameras, video recorders and other similar technologies.

6. PROVISION OF PERSONAL DATA

We transfer your personal data to:

To service providers:

- Security companies (data processor);
- Companies that maintain CCTV cameras and/or video recorders (data processor).

Such service providers may only process your personal data on our instructions and may not use it for other purposes. In addition, such service providers are bound by written contracts to comply with confidentiality and other obligations under the GDPR.

To Avia Solutions Group companies¹:

- We do not normally share such personal data with other Avia Solutions Group companies, however, if it is necessary for us to do so in order to achieve our objectives and in accordance with the principle of legitimate interest, we may transfer your personal data to related Avia Solutions Group companies.

To law enforcement agencies, state and local authorities:

¹ Avia Solutions Group companies' contacts: <https://aviasg.com/en/the-group/general-contacts>

- In order to comply with our legal obligations, we may transfer your personal data to law enforcement authorities and state and local government agencies upon request. We may also transfer your personal data to law enforcement authorities, state and local authorities in order to pursue our legitimate interests and to assert, exercise and defend legal claims.

7. TRANSFER OF PERSONAL DATA OUTSIDE THE EU/EEA

Your personal data is processed and stored within the EU/EEA. Transfers of personal data to third countries or international organisations are not applicable.

8. DO WE USE AUTOMATED DECISION-MAKING OR PROFILING?

We do not use automated decision-making, nor do we profile your personal data.

9. YOUR RIGHTS

You have a guaranteed right:

- **to know** about the processing of your personal data;
- **to have access** to your personal data processed;
- **to request correction** of your personal data processed;
- **to object** to the processing of your personal data where the processing is based on the **legitimate interest** of the Company, however, if we have compelling reasons to process it, we will process the personal data regardless of your objection.
- may, in certain cases, **require the destruction ("right to be forgotten")** of your personal data;
- **to restrict** the processing of your personal data in certain cases.

10. WHERE TO GO TO REPORT A VIOLATION OF RIGHTS?

If you believe that the Company is processing your personal data in violation of the requirements of legal acts, you have the right to lodge a complaint with the State Data Protection Inspectorate (SDPI) at the address L. Sapiegos g. 17, 10312 Vilnius, Lithuania, e-mail: ada@ada.lt; tel: (8 5) 271 28 04, 279 1445, website: <https://vdai.lrv.lt/lt/>. In all cases, we recommend that you contact us before submitting a complaint to the VDAI so that we can resolve the situation amicably.

11. CHANGES TO THE PRIVACY NOTICE

The Company has the right to update this Privacy Notice in the event of changes in legislation or other objective circumstances, and we encourage you to review this Privacy Notice regularly.