## Information on data processing to employees and individuals entering areas monitored by the video surveillance system (the "Memorandum")

Dear employees and persons entering areas monitored by the video surveillance system,

This Memorandum is to inform you as **data subjects** on the principles and procedures applicable to the processing of your personal data and on your rights related to the processing of this data, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/ES (General Data Protection Regulation; hereinafter the "**GDPR**") and in accordance with Act No. 110/2019 Coll., on Processing of Personal Data, as amended (hereinafter the "**PDPA**").

Our company respects transparent and fair processing of your personal data and its appropriate protection according to the applicable legislation to ensure correct and fair processing. We protect your personal data with the highest security to prevent any unauthorized or accidental access to, destruction, loss, unauthorized transmissions, or unauthorized processing of your personal data. For this purpose, we comply with the relevant technical and organisational measures to ensure an appropriate level of security with respect to all possible risks. Persons who handle personal data are obliged to maintain confidentiality of the information obtained in connection with the processing of this data.

As personal data protection terms and abbreviations are used in this Memorandum, we have included an explanation of these terms and abbreviations in section **'List of selected terms and abbreviations'** in order to make the content of this Memorandum as clear and comprehensible as possible.

### Controller

The controller of your personal data is the company **EP Real Estate, a.s.**, company reg. No. **051197155,** having its registered office at **Partyzánská 1/7, Holešovice, 170 00 Prague 7,** registered in the Commercial Register under file No. **B 21696/MSPH**, (the "**Controller**") who is responsible for discharging the obligations under the applicable data protection laws.

### Video surveillance system

The Controller hereby informs you that, in the designated premises located at náměstí Marie Schmolkové 3493/1, Strašnice, 100 00 Prague 10 (hereinafter referred to as the "Premises"), a CCTV system with recording is operated for the purpose specified below.

The use of the CCTV system is indicated by information signs placed on the relevant premises and by this memorandum.

The CCTV system is operated on behalf of the Controller by EP Investment Advisors, s.r.o., Company ID No. 26687259, with its registered office at Pařížská 130/26, Prague 1 – Josefov, Postal Code 110 00, registered in the Commercial Register under File No. C 87354 maintained by the Municipal Court in Prague.

| Address | Floor | Camera Type | No. of Cameras | Coverage Area | GDPR Controller | Retention Period |
|---|---|---|---|---|---|---|
| náměstí Marie Schmolkové 3493/1, Strašnice, Prague | 3rd Floor | Fixed camera with video recording | 1 | Reception | Controller | 30 days |
| | | Fixed camera with video recording | 2 | Exit | Controller | 30 days |
| | | Fixed camera with video recording | 2 | Staircase | Controller | 30 days |
| | | Fixed camera with video recording | 1 | Server Room | Controller | 30 days |

| Address | Floor | Camera Type | No. of Cameras | Coverage Area | GDPR Controller | Retention Period |
|---|---|---|---|---|---|---|
| | | Fixed camera with video recording | 1 | Storage Staircase | | |

## List of selected terms and abbreviations

| TERM/ABBREVIATION | DEFINITION |
|---|---|
| Personal data | Any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, **directly or indirectly**, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. |
| Special categories of personal data | Personal data revealing racial or ethnic origin, political opinions, religion or philosophical beliefs or trade union membership, and processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, and data concerning health or data concerning a natural person's sex life or sexual orientation. |
| Data subject | The natural person to which the personal data relates. A data subject is deemed to be identified or identifiable if, based on one or several personal data, the data subject's identity can be directly or indirectly determined. |
| Controller | The natural or legal person, public authority, agency or another body, which, alone or jointly with others, determines the purposes and means of processing of personal data. |
| Processing | **Any** operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. |
| Purpose of processing | The objection and purpose of the Controller's activity |
| Means of processing | The tools and processes selected for specific processing of personal data. |
| Legal ground | The condition without which the processing of personal data is **not in any case possible**. |
| Processor | A natural or legal person, public authority, agency or another body which processes personal data on behalf of the Controller. |
| Recipient | A natural or legal person, public authority, agency or another body to which the personal data is disclosed, whether a third party or not. The Recipient has the legal, contractual or other authority to process personal data. These are other controllers or processors, such as tax, administrative or regulatory authorities. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with the Member State law shall not be regarded as recipients; the processing of that personal data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing. |
| Third party | A natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data. |
| OPDP | The **Office for Personal Data Protection** is the supervisory authority under the PDPA. The competences of the central administrative authority related to personal data protection to the extent provided for in the PDPA and other competences laid down in a special law are assigned to the OPDP. |

## Controller's contact details

Should you have any questions regarding the processing of your personal data, please feel free to contact us. You can use the address, email and telephone of the Controller referred to in sections **'Controller'** and **'Exercise of the rights of data subjects'**.

## Processed personal data

The Controller processes, based on the relevant legal ground and purpose of processing, the following personal data:

- Video recordings of data subjects, appearance **and images of the behaviour and actions of the persons recorded information on the time of recording**.

## Source of the personal data being processed

The Controller obtains your personal data **through the Controller's video surveillance system**.

## Purpose and duration of the processing of personal data

The Controller processes your personal data for the purpose of protecting the property, lives and health of individuals moving in the area being monitored by the video surveillance system. CCTV footages are automatically deleted after 30 days.

## Legal basis for the processing of personal data

Legal basis for the processing of personal data is the legitimate interests pursued by the Controller under Article 6 (1) (f) GDPR.

## Manner and means of processing

The Controller processes your personal data by **automated** means using **Synology surveillance station** (CCTV).

In processing your personal data by automated means, the Controller **does not apply automated decision-making, including profiling,** that might affect your rights.

## Processor

The Controller processes your personal data through its employees who need access to the personal data in order to perform their duties and who are obliged to maintain confidentiality of all facts and information of which they become aware in the course of their employment. For the above purpose, the Controller does not process personal data through a processor.

## Recipients of personal data

The Controller may, in certain circumstances, transfer your personal data to recipients and third parties.

These **recipients** include, for example, the Police of the Czech Republic in the context of investigating infringement, insurance company, data subject.

However, where public authorities require personal data in the framework of a particular inquiry, they are not considered to be recipients but **third parties**.

## Transfer of personal data to third countries

The Controller processes your personal data in the Czech Republic.

## Rights of data subjects

- **Right of access** to personal data (Article 15 GDPR)
  Ensured upon request of the data subject to the extent of the data processed about him/her. Image records are provided to data subjects in an enhanced machine-readable format.
- **Right to rectification** of personal data (Art. 16 GDPR)
  Given the nature of the personal data processed (image record), the right to rectification does not apply. Unauthorised interference with CCTV data is dealt with by means of technical and organisational measures of the CCTV footage.
- **Right to erasure** of personal data (Art. 17 GDPR)
  Due to the retention period, the data subject has the right to request the erasure of the data on which displayed, if the recording does not capture an extraordinary event.
- **Right to restriction** of processing (Article 18 GDPR)
- **Right to data portability** (Article 20 GDPR)
  Not applicable, portability to a new controller is meaningless, but the data subject may exercise the right access, where he or she is provided with visual records of his or her person in machine-readable format (see above).
- **Right to object** (Article 21 GDPR)
  The data subject has the right to object, e.g. via the controller's e-mail address (see below
- **Right to lodge a complaint** with OPDP (Art. 77 GDPR)

## Updates to the Memorandum

As the rules and conditions for the processing and protection of your personal data may change, in particular as a result of changes in legislation, or our terms, procedures and methods of processing and protecting your personal data may change, we will inform you of such changes by updating this Memorandum, unless such change requires contacting you directly.

This Memorandum was last updated on 9.6.2026.

## Exercise of the rights of data subjects

If you exercise your right pursuant to section **'Rights of data subjects'** by presenting a **request**, the Controller is **always obliged** to handle such request of the data subject and is obliged to provide the information without undue delay after receipt of the request, in any case **within one month from receipt of the request. In exceptional circumstances,** this period may be extended by two months, of which the data subject must be informed by the Controller, including the reasons for such extension.

You can send your request using the Controller's contact details specified in section **'Controller'**, to the email address office@epre.cz

In order to facilitate the exercise of your rights, we have prepared a sample **Data Subject Request Form**.

**If you have reasonable suspicion** that there has been a breach of law in connection with Personal Data protection, **you have the right to lodge a complaint with the Office for Personal Data Protection, Pplk. Sochora 727/27, 170 00 Prague 7 – Holešovice, email:** stiznosti@uoou.cz, use the form available on the website of the Office for Personal Data Protection https://uoou.gov.cz/verejnost/stiznost-na-spravce-nebo-zpracovatele.