

**INFORMATION ABOUT THE PROCESSING OF YOUR PERSONAL DATA
IN RELATION TO VIDEO SURVEILLANCE**
Version 21.11.2024.



1. General information

Joint Stock Company "VALMIERAS PIENS" (hereinafter referred to as "the Company" or "we") conducts video surveillance as part of its operations, during which your personal data is collected.

Video surveillance is considered to be the processing of personal data by automated means and, if it is possible to recognise (identify) specific individuals in the video material, it may be considered to be the processing of personal data.

Video surveillance (CCTV) is carried out in the company's outdoor and indoor areas. An information sign is placed in front of each CCTV area to warn persons that the area is being monitored and that any person in the area will be under video surveillance.

The provision of personal data is unavoidable when entering a video surveillance area, but we may only need your personal data in the form of an identifiable video image in the cases prescribed in further sections of this notice.

When obtaining and processing your personal data, the company acts as the data controller (responsible for the processing of your personal data) as set out in this notice.

2. Information on the personal data being collected

Personal data is any information relating to an identified or identifiable natural person or data subject. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to a specific identifier.

Video surveillance recordings contain personal data in the form of video images or still images, where the identifier can be any information about the person contained in the video image, such as the registration number of the vehicle used by the person, person's location, date and time of being in the current location, geographical coordinates etc.

Video surveillance data means the video image, the photographic record and other data related to the video surveillance process that are extracted from the video recording.

Video surveillance data is automatically recorded without personal identification when a data subject is within the field of view of the surveillance equipment installed at the monitored location / area.

3. Purposes and legal basis for the personal data processing

Video surveillance is used to protect the property of the Company and its employees and persons who are in the property against possible theft, vandalism or damage, to prevent offences and irregularities, to facilitate the investigation of offences and violations, to facilitate the detection of consumer claims, to detect and prevent risks to personal health and life, to ensure and monitor compliance with food safety requirements in the establishment and to protect the legitimate interests of the company.

Your personal data is processed in accordance with Section 6(1)(f) of the General Data Protection Regulation (our legitimate interests or those of third parties).

Our legitimate interests are the protection of our property, including the products we produce, the prevention and detection of violations and criminal offenses, ensuring internal order, food safety, protection of the Company's reputation and other legal interests.

The legitimate interests of third parties (such as our employees, visitors, customers, suppliers, other business partners and consumers) include the protection of their property, health and life and other legitimate interests.

4. Recipients of personal data

Your personal data will be disclosed to independent service providers (third parties) who provide security, real estate monitoring, information technology, legal representation (if necessary) and other services to us on a contractual basis. Video surveillance recordings may be accessible to data processors involved in the maintenance or servicing of the video surveillance system. In certain cases, personal data may be provided to insurance providers for the investigation of insurance claims or to law enforcement authorities (State Police, investigating authorities, courts) for the investigation or prosecution of unlawful activities. Personal data will only be transferred or made available to these third parties for the purpose of providing services to us or on a statutory or regulatory basis.

The Company does not transfer or make available video surveillance data to recipients from third countries or international organisations. Your personal data will not be transferred outside the European Union and European Economic Area. The video recordings are also not released to the media.

5. Protection, use and storage of personal data

The Company recognises the importance of individuals' right to privacy and implements both technical and organisational measures to control access to and protect video surveillance data. Video surveillance data is restricted information and is processed in accordance with the Company's internal regulatory documents, which set out the procedures for administering the video surveillance system and processing and protecting video surveillance data.

Most video recordings are stored for an average of two weeks to a month, but depending on the configuration, resolution and amount of video data of the video surveillance camera, a video recording can be stored for up to two months. The video recordings are then overwritten with new ones.

The length of time copies of video recordings are kept depending on the purpose. For example, as a company operating in the food sector, there is a possibility that a consumer submits a complaint about a product and the complaint may be received during the shelf life of the product (which may be up to several months long). In the mentioned case a video surveillance footage of the production process of a particular batch of the product may be useful in the complaint handling process.

If an investigation is launched or legal proceedings are planned, the video recordings may be kept until the end of the investigation or legal proceeding's process, including any appeal period, after which they will be deleted. If storage of data is required by the law, we will comply with the relevant requirements.

Video surveillance recordings and their backup copies are deleted automatically within the time limits indicated above, but in certain cases, as indicated above, they are deleted manually immediately after the legal basis has ceased to exist.

Video recordings are stored on a secure server managed by the company. The company is continuously improving its data storage systems, data security tools and mechanisms.

6. Your rights

Data protection legislation gives you the right to influence the processing of your personal data.

As a data subject, you are not obliged to provide us with your personal data. However, if you do not want us to have access to your personal data, your access to our premises may be restricted or denied.

You have all the rights guaranteed by the General Data Protection Regulation, such as the right to access and receive information about the processing of personal data; the right to have incorrect, inaccurate or incomplete personal data rectified; the right to be forgotten; the right to lodge a complaint with the Data State Inspectorate (www.dvi.gov.lv) and other rights.

To request access to a video recording, you must provide the Company with all necessary information (e.g., your photograph, a description of your appearance, the date, and the time) to enable us to identify you in the footage. The company shall ensure that no more data is released than is necessary. For example, if a video recording is several hours long, but you only appear briefly, you only have the right to access the part of the recording that is relevant to you. If the video recording includes other individuals, the Company will carefully assess whether it is necessary to redact their data before providing the recording to you. The company will not provide you with a video recording if there are reasonable doubts about your recognisability or the validity of the request.

To exercise your rights, you can contact us using the details below, either by sending your request by post or by email.

7. Information about the data controller

Name: "Valmieras piens", joint stock company

Registration number 40003020475

Address: 93 Rigas Street, Valmiera, Valmiera District, LV-4201

Phone +371 67066887

E-mail: valmieras.piens@vpiens.lv

Contact details of the data protection officer: dati@foodunion.com