

1. Data Controller

Data Controller of your personal data (image data) is the Company under the name "MED SEA HEALTH S.A.", (hereinafter referred to as "Miraggio"), which is located in Kanistro, Paliouri Chalikidiki, 63085, as legally represented, call center +30 2374 440000 and contact e-mail info@miraggio.gr. Miraggio's vision is to provide high quality hosting services. Therefore, with respect to the applicable provisions of European and National Data Protection legislation, hereby informs you about the purpose of processing your data (image), the legitimate basis for processing, their retention's period and the appropriate safeguards for the security and protection of such data.

2. Processing Purpose and Legitimate Basis

Miraggio uses a video surveillance system - CCTV. The purpose of the processing of personal data (image) is the protection and security on the one hand of the natural persons (personnel, customers, visitors, etc.) who enter the premises of the hotel and on the other hand of their property and Miraggio's. The above processing is necessary for the purpose of safeguarding its legitimate interests, which it seeks as a data controller (article 6 par. 1 GDPR (EU) 2016/679).

3. Legitimate Basis Analysis

The installation of a video surveillance system - CCTV ensures the safe, orderly and smooth operation of the hotel. Its legal interest is in the need to protect its premises and the property, located in them from possible illegal acts. The same applies to the safety of life, physical integrity, health as well as the property of the personnel and third parties (customers, visitors, etc.) who are legally in the supervised area, so as to constitute a safe place of residence, hospitality and entertainment. Miraggio only collects image data and limits the receipt to the absolutely necessary, where there is a possibility of committing illegal acts e.g. theft, such as the entry/exit points, the reception area, the entrances/exits of the elevators and stairwells, the area of the electrical installations/rack office etc. The installation of the video surveillance system - CCTV in the above points is considered legal, lawful and permissible, according to the instructions of the Data Protection Authority ("DPA").

4. Receivers

The kept material is accessible only by the competent/authorized personnel of the hotel, which is in charge of the Security of the premises and the Administration. This material is not transmitted 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 offense involving people or property of Miraggio; (b) to the

competent judicial, prosecutorial and police authorities when requesting data lawfully in the performance of their duties and (c) to the victim or perpetrator of a criminal offense, in the case of data that may constitute evidence of the offense.

5. Retention's Period

Miraggio retains the (image) data for fifteen (15) business days, after which it is automatically deleted. In the event of a criminal incident (eg theft, robbery, manifestation of physical violence etc.) against Miraggio's people (personnel) and tangible property, keep the pictures in which the particular incident is recorded in a separate file for thirty (30) days, in order to investigate the above incident and initiate legal proceedings to defend its legal interests. If the incident concerns a third party, Miraggio will keep the video (images) for up to three (3) more months.

6. Data Subjects Rights

Data Subjects (personnel, customers, visitors, etc.) have the following rights:

- ✓ **Right to Access:** you have the right to know if we are processing your image and, if applicable, to receive a copy.
- ✓ **Right to Restriction:** you have the right to ask us to restrict processing, such as not deleting data that you deem necessary to establish, exercise or support legal claims.
- ✓ **Right to Object:** you have the right to object to the processing of your data.
- ✓ **Right to Erasure:** you have the right to request to erasure your data.

To exercise your rights, fill in the special form and send it either by post to the hotel headquarters (Kanistro, Paliouri, Chalkidiki, 63085) or electronically to the address dpo@miraggio.gr or submit it in person at the above address. In order for Miraggio to consider a request related to your image, you will need to determine when you were within range of the security cameras and provide an image to make it easier for the hotel to locate your data and hide third-party depicted data. Alternatively, Miraggio allows you to come to its premises to show you the images in which you appear. It is also pointed out that the exercise of the right of objection or erasure does not imply the immediate erasure of data or the modification of the processing. In any case, Miraggio will answer you in detail as soon as possible, within the deadlines set by the GDPR (EU) 2016/679 and in accordance with its internal procedure.

7. Right to file a complaint

In case the processing of the data concerning you is considered in violation of Regulation (EU) 2016/679 you have the right to file a complaint to a supervisory authority. Competent

supervisory authority for Greece is the Data Protection Authority, 1-3 Kifissias, 11523, Athens, <https://www.dpa.gr/>, tel. 210 6475 600.

8. Safeguards

Miraggio assures you that it has exhausted all technical and organizational measures for the protection of personal data (image data) collected through the CCTV system and makes the optimum, minimum and absolutely necessary use and processing thereof, as required by law, and strictly and exclusively for the purpose described in detail above.