

## Camera Surveillance Protocol for VISITORS

### 1. INTRODUCTION

This protocol applies to all visitors of Rupro Beheer B.V. and its subsidiaries ("Rupro"). These visitors are referred to hereinafter as "**visitor**" or "**visitors**".

Rupro uses (visible) camera surveillance at the location(s) of its subsidiaries [Rema Tip Top Nederland B.V.](#) ("**Rema Tip Top**"), LBS Conveyor Belts B.V. ("**LBS**") and Transportbanden Service Nederland B.V. ("**TSN**").

In the camera surveillance a number of personal data are processed. Naturally, Rupro respects visitors' privacy. This means that Rupro processes the collected personal data only in so far and to the extent that this is in accordance with the General Data Protection Regulation ("**GDPR**") and the Dutch General Data Protection Regulation Implementation Act ("**GDPRIA**").

The GDPR provides that Rupro has to inform visitors about (among other things) the personal data that Rupro processes with the camera surveillance, the purpose(s) thereof and the reason(s) for that. Rupro provides that information in this protocol.

### 2. THE CAMERA SURVEILLANCE AND ITS PURPOSE(S)

In the context of the camera surveillance, video recordings of visitors may be processed. Rupro processes these video recordings for the following purposes:

- ensuring safety on the work floor;
- detecting and preventing theft of and damage to the private property of Rupro's employees and/or its subsidiaries (hereinafter "employees");
- detecting and deterring theft of and damage to Rupro's and/or its subsidiaries' company property.

### 3. LEGAL BASIS FOR PROCESSING

The legal basis for the camera surveillance is the protection of the legitimate interest of Rupro or a third party. This legitimate interest consists of:

- preventing and detecting infringements of property rights of employees, Rupro and/or its subsidiaries;
- preventing and detecting theft of private property of employees;
- preventing and detecting theft of Rupro's and/or its subsidiaries' company property;
- preventing and detecting (other) unlawful behaviour.

Camera surveillance is necessary because reports of (suspected) theft of (private) property have taken place. Other measures - such as placing of lockers - have not had sufficient effect.

Rupro has installed cameras in and around all the branches of TSN, LBS and Rema Tip Top Nederland. Rupro has marked the places where the cameras are located with stickers, so that visitors know where they are being filmed.

No sound recordings are made with the cameras. In addition, the video recordings are only viewed after the fact, i.e., after a (suspected) incident. The necessity of the camera surveillance is evaluated periodically.

#### **4. DATA RETENTION PERIOD**

Rupro does not retain the video recordings for longer than one month, unless longer retention is necessary. This is the case, for example, if storing the video recordings is necessary in order to process a report of a (suspected) theft or other unlawful behaviour.

#### **5. SHARING PERSONAL DATA WITH THIRD PARTIES**

If necessary and to the extent required, Rupro will share the video recordings within the Group and/or with third parties, such as the police.

#### **6. SECURITY**

Rupro takes the protection of visitors' personal data seriously and has taken appropriate technical and organisational measures to prevent unauthorised access to and loss of the video recordings.

For example, Rupro has secured the relevant hardware with a unique access control using a user name and password, and/or has secured the relevant space with a lock to ensure that only authorised persons have access to the personal data.

#### **7. VISITORS' RIGHTS**

Under the GDPR, visitors have the following rights with regard to the processing of their personal data:

##### **Right of access and inspection**

The visitor has the right to access and inspect his/her personal data processed by Rupro.

##### **Right of rectification and erasure**

The visitor has the right to have his/her personal data rectified or even erased if the data is not or no longer correct or if the processing is not or no longer justified.

## **Right to object**

The right to object means that the visitor can object to certain processing of his/her personal data. However, cameras cannot by themselves distinguish between individuals. Therefore, Rupro considers the use of the right to object to be a request for a general reconsideration of the placement of the camera(s) in question.

If the visitor raises an objection, Rupro will assess whether it can meet the objection.

In that case it is up to Rupro to prove that, despite the visitor's objection, Rupro has a legitimate interest in continuing the use of the camera(s). It is noted that Rupro has already carefully weighed up whether using the cameras is justified when making the choice to do so. If the balancing of interests falls in the visitor's favour, Rupro will, in principle, discontinue video recordings with the relevant camera(s).

## **Right to restriction**

In certain circumstances, the visitor also has the right to request restriction of the processing of his/her personal data. In short, this means that Rupro temporarily "freezes" the processing of personal data. However, here too, cameras do not distinguish between individuals. Therefore, Rupro regards the right to restriction as a request to temporarily turn off the (relevant) camera(s).

In principle, the visitor can invoke this right in four situations: (1) pending the assessment of a rectification request, (2) if personal data should actually be erased but the visitor does not want them to be erased, (3) if Rupro no longer needs the personal data but the visitor still needs the data for (the preparation of) legal proceedings, and (4) pending assessment of an objection.

## **Exercise of rights**

The exercise of these rights is free of charge for the visitor, except in the case of abuse. The visitor can exercise the rights by contacting us using the contact details below.

## **Reply period**

Rupro will in principle reply to visitors' questions/requests within one month. In the unlikely event that the answer to the question or request requires more time, Rupro will inform the visitor thereof within one month. It may be that due to the complexity of the questions and/or requests and/or the number of questions and/or requests, the reply period can total up to three months.

## **Identification**

Rupro may in all enquiries/requests from visitors ask for further proof of a visitor's identity. Rupro does this in order to prevent personal data from being provided to the wrong party or to prevent that unauthorised changes are made to the processing of personal data. Therefore, in order to ensure that the question and/or request is processed as smoothly as possible, Rupro requests that the visitor provide a copy of his/her identity document in advance.

## **Individual assessment of each request**

The rights described above are not absolute rights. There may be circumstances which prevent Rupro from acceding to a particular request. Rupro will always assess each request on its own merits. In the event that Rupro is unable to honour a particular request, it will naturally state the reasons for that. The visitor may then take the matter to court.

## **8. SUPERVISORY AUTHORITY**

Furthermore, the visitor is always free to file a complaint with the supervisory authority. The supervisory authority for privacy legislation is the Dutch Data Protection Authority. The contact details of the Personal Data Authority can be found on the website **[www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl)**.

## **9. QUESTIONS**

For questions about this protocol or for an appeal to one of the (above-mentioned) legal rights, we can be contacted by using the information below:

### **Rupro Beheer B.V.**

Attn.: Compliance Officer, Mr. Alfred van Olst  
PO Box 5312  
6802 EH ARNHEM  
[alfred@ruprobeheer.nl](mailto:alfred@ruprobeheer.nl)

## **10. CHANGES**

This protocol is subject to change. Such changes will be announced by Rupro. For example, Rupro may decide to process visitors' personal data for new purposes not yet stated in this protocol. In such a case, Rupro will contact the visitors before their personal data are used for those new purposes, and give them the opportunity to object.