

Politika izvajanja videonadzora v družbi Domel, d.o.o., Domel Holding, d.d. in Domel IP, d.o.o.

Obvestilo o videonadzoru: Obvestilo zaposlenim in zunanjim osebam po 3. odstavku 76. člena zakona o varstvu osebnih podatkov – ZVOP-2 (ULRS 163/22) o izvajanju videonadzora v prostorih družbe Domel, d.o.o., Otoki 21, 4228 Železniki.

Uveden je videonadzor vstopov in izstopov ter gibanje oseb po hodniku, v skladišču ter na zunanji površini okoli zgradb na naslovih: Otoki 21, Železniki, Na Plavžu 79, Železniki, Kidričeva 66, Škofja Loka, Gorenja vas – Reteče 4, Škofja Loka, ki so vse lasti Domel, d.o.o. ter v videonadzor vstopov in izstopov ter gibanje oseb po hodniku, v skladišču ter na zunanji površini okoli zgradb na naslovih: Kidričeva 81, Škofja Loka in Češnjica 48d, Železniki, ki jih za opravljanje svoje dejavnosti podjetje Domel, d.o.o. in podjetje v Domel IP, d.o.o. najemata.

Videonadzor se izvaja s kamerami tako, da so s posnetki videokamer zajeta območja ki so označena PR659 (lokacija video nadzornih kamer), ki je na voljo pri osebi pooblaščen za varstvo osebnih podatkov in videonadzor.

Pred vstopom v vsako območje se namesti obvestilo z informacijami, da izvaja se videonadzor ter QR kodo in telefonska številka, kjer se pridobijo dodatne informacije za pridobitev informacij kje in koliko časa se shranjujejo posnetki iz videonadzornega sistema. Za videonadzor vstopov in izstopov ter gibanja oseb v prostorih in na parkirišču poslovnih stavb, se vzpostavi zbirka osebnih podatkov, ki vsebuje podatke oseb, ki vstopajo, izstopajo v poslovne prostore oz. se gibljejo v poslovnih prostorov ter na parkirišču in sicer: posnetek posameznika, datum in čas vstopa in izstopa iz prostorov.

Prek videonadzora se spremlja in snema tekoče dogajanje pri vstopih in izstopih v poslovne prostore ter gibanje oseb v poslovnih prostorih ter parkirišču. Posnetki se shranjujejo omejen čas največ 30 dni. Monitor za spremljanje videoposnetkov je nameščen v recepciji pri vhodu na lokaciji Otoki 21, Železniki in v recepciji pri vhodu na lokaciji Kidričeva 66, Škofja Loka. Dostop do posnetkov ima, skladno s Pravilnikom o varovanju osebnih podatkov še pooblaščen oseb iz informatike in direktor splošnega področja.

Upravljavlec videonadzora

Domel, d.o.o., Otoki 21, 4228 Železniki.

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Kontakti pooblaščen osebe za varstvo osebnih podatkov:

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Namen izvajanja videonadzora:

- zagotavljanje varovanja premičnega in nepremičnega premoženja,
- zagotavljanje varnosti zaposlenih,
- zagotavljanje varnosti obiskovalcev.

V poslovni stavbi na Otoki 21, Železniki in Kidričeva 66, Škofja Loka, je zagotovljeno fizično varovanje s strani pooblaščenega varnostne službe in zaposlenih v podjetju. V okviru varnostne službe je zagotovljeno varovanje vhoda, pregled strank oz. obiskovalcev v poslovne prostore družbe ter njihove osebne prtljage, posredovanje informacij, občasni obhodi znotraj območja Domel, d.o.o.

Glede na naravo dela, ki se opravlja v družbi Domel, d.o.o., pretoka obiskovalcev poslovne stavbe ter zaradi večje varnosti ljudi in premoženja ter varovanja poslovne skrivnosti, zaradi zagotavljanja nadzora vstopa ali izstopa v ali iz službenih prostorov je potrebno minimalen standard fizičnega varovanja dopolniti s sistemom videonadzora. Z uvedbo videonadzora je omogočen nadzor gibanja strank pred vhodom v poslovne prostore, kot tudi med prehodi prostorov znotraj obrata. Znotraj prostorov se omogoča nadzor na strateških točkah, kot so transportne poti, vhodi v zgradbe, skladišče, prevzem ter parkirišča, kjer so parkirana službena vozila oz. privatna vozila zaposlenih. Gre za prostore, kjer se dnevno giblje večje število ljudi in se zgolj z fizičnim varovanjem ne more zagotoviti zadostno varovanje ljudi, premoženja in poslovne skrivnosti.

Pravna podlaga: videonadzor se izvaja na podlagi zakonitega interesa in v skladu z določili 77. člena ZVOP-2.

Obdobje hrambe posnetkov videonadzornega sistema: do 30 dni.

Uporabniki posnetkov videonadzornega sistema: pooblaščen osebe upravljavca v skladu s Pravilnikom o izvajanju videonadzora.

Informacija o prenosu videoposnetkov v tretje države: posnetki videonadzornega sistema se ne prenašajo v tretje države.

Pouk o pravicah posameznika glede posnetkov videonadzornega sistema

Posameznik, ki se prepozna na posnetku videonadzornega sistema oz. posameznik, ki ga je posnela videonadzorna kamera, ima pravico do:

- dostopa do osebnih podatkov oz. pravico do vpogleda v posnetek videonadzornega sistema, ki se nanaša na osebo na posnetku,
- popravka - zameglitve ali izbrisa ali omejitve obdelave posnetka videonadzornega sistema,
- ugovora obdelavi posnetka videonadzornega sistema,
- prenosljivosti podatkov videonadzornega sistema - kopije posnetka.

Informacija o pravici do vložitve pritožbe: pritožbo glede posnetka videonadzornega sistema lahko podate na naslov upravitelja s pripisom »Pooblaščen osebni za varstvo podatkov«.

Nujnost zagotovitve osebnih podatkov oz. privolitve v video nadzor oz. snemanje: osebna privolitev ni potrebna zaradi obstoja zakonske podlage za izvajanje videonadzora; posameznik ima pravico, da ne vstopi v območje, prostor ali objekt, v katerem se izvaja videonadzor.

Obstoj avtomatiziranega sprejemanja odločitev in oblikovanja profilov: ne.

Informacije o posebnih vplivih obdelave, zlasti nadaljnje obdelave: takšnih vplivov in obdelav ni.

Neobičajne nadaljnje obdelave:

- nadaljnja obdelava posnetkov videonadzornega sistema se ne izvaja,
- zvočna intervencija za čas videonadzora se ne izvaja,
- nadzor s pomočjo videonadzornega sistema lahko spremljajo pooblaščen osebe na računalniškem zaslonu - spremljanje dogajanja v živo.

Video Surveillance Policy

Domel d.o.o., Domel Holding d.d., and Domel IP d.o.o.

Notice on Video Surveillance

Notice to employees and third parties pursuant to Article 76(3) of the Personal Data Protection Act (ZVOP-2, Official Gazette of the Republic of Slovenia No. 163/22) regarding the implementation of video surveillance at the premises of **Domel d.o.o., Otoki 21, 4228 Železniki**.

Video surveillance is in operation at entrances and exits, as well as in corridors, warehouses, and outdoor areas surrounding the buildings at the following locations:

- Otoki 21, Železniki
- Na Plavžu 79, Železniki
- Kidričeva 66, Škofja Loka
- Gorenja vas – Reteče 4, Škofja Loka

These properties are owned by Domel d.o.o..

Video surveillance is also carried out at entrances, exits, corridors, warehouses, and outdoor areas surrounding the buildings at:

- Kidričeva 81, Škofja Loka
- Češnjica 48d, Železniki

These premises are leased by Domel d.o.o. and Domel IP d.o.o. for the purpose of conducting their business activities.

The surveillance system operates through cameras covering the areas specified in document **PR659 (Video Camera Locations)**, which is available from the Data Protection Officer and the person responsible for video surveillance.

Prior to entering each monitored area, a notice is displayed informing individuals that video surveillance is in operation. The notice also includes a QR code and a telephone number through which additional information can be obtained regarding the location and retention period of surveillance recordings.

For the purpose of monitoring entrances, exits, movement within company premises, and parking areas, a personal data filing system has been established containing the following information:

- an image of the individual,
- the date and time of entry and exit from the premises.

Video surveillance continuously records activities at entrances and exits, as well as movement within the business premises and parking areas.

Recordings are retained for a maximum of **30 days**.

Live monitoring screens are located at the reception desk at **Otoki 21, Železniki**, and at the reception desk at **Kidričeva 66, Škofja Loka**.

In accordance with the Company's Personal Data Protection Rules, access to the recordings is granted to authorized personnel, including an authorized IT representative and the Director of General Affairs.

Data Controller

Domel d.o.o.

Otoki 21
4228 Železniki, Slovenia

Registration No.: **5805937000**

VAT No.: **SI52957667**

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Data Protection Officer

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Purpose of Video Surveillance

Video surveillance is implemented for the purpose of:

- protecting movable and immovable property,
- ensuring the safety of employees,
- ensuring the safety of visitors.

At the business premises located at **Otoki 21, Železniki**, and **Kidričeva 66, Škofja Loka**, physical security is provided by an authorized security service and company employees.

Security measures include:

- entrance security,
- verification of visitors entering the premises,
- inspection of visitors' personal belongings,
- providing information to visitors,
- periodic security patrols within the Domel premises.

Considering the nature of the company's operations, the flow of visitors through the business premises, the need to protect people, property, and confidential business information, and to control entry to and exit from the premises, physical security measures alone are not sufficient.

The video surveillance system therefore complements the minimum standard of physical security.

The system enables monitoring of visitor movement in front of entrances and throughout internal passageways. Within the premises, surveillance is carried out at strategic locations, including:

- transport routes,
- building entrances,
- warehouses,
- receiving areas,
- parking areas used by company and employees' private vehicles.

These are areas with a high daily volume of people where physical security alone cannot provide adequate protection of people, property, and confidential business information.

Legal Basis

Video surveillance is carried out on the basis of the controller's **legitimate interest**, in accordance with Article 77 of the Slovenian Personal Data Protection Act (ZVOP-2).

Retention Period

Video surveillance recordings are retained for **up to 30 days**.

Recipients of the Recordings

Recordings may only be accessed by authorized personnel of the controller in accordance with the Company's Video Surveillance Policy.

Transfer of Data to Third Countries

Video surveillance recordings are **not transferred to third countries**.

Rights of Individuals Regarding Video Surveillance Recordings

Any individual identifiable in a video surveillance recording has the right to:

- access their personal data and obtain access to recordings relating to them;
- request rectification through masking (blurring), erasure, or restriction of processing of the recording;
- object to the processing of the recording;
- receive a copy of the recording (data portability), where applicable.

Right to Lodge a Complaint

Complaints relating to video surveillance recordings may be submitted to the Data Controller, marked:

"For the Attention of the Data Protection Officer."

Requirement to Provide Personal Data

Consent is **not required** for video surveillance, as processing is based on a legal basis established by applicable legislation.

Individuals nevertheless retain the right not to enter an area, room, or facility where video surveillance is in operation.

Automated Decision-Making

No automated decision-making or profiling is carried out.

Information on Special Processing Effects

There are no special effects arising from the processing of personal data, including any subsequent processing.

Unusual Forms of Further Processing

- Video surveillance recordings are not subject to further processing.
- Audio recording or audio intervention is not carried out.
- Authorized personnel may monitor the video surveillance system in real time via computer screens (live monitoring).