



Linpac Packaging Pontivy SAS CCTV Privacy Notice

This Privacy Notice informs you as an employee or a visitor of the operation of the Closed Circuit Television (CCTV) System at the parking lots of the Linpac Packaging Pontivy SAS (Linpac) site and your privacy rights in accordance with the General Data Protection Regulation (GDPR). Linpac is committed to safeguarding the privacy of its employees and visitors. CCTV footage will be used solely for the purposes stated in this Privacy Notice.

1. Controller

Linpac is the controller of the CCTV system under the GDPR.

You can contact Linpac at:

Linpac Packaging Pontivy SAS
Parc d'Activités de Kerguilloten
56920 Noyal-Pontivy
France

surete.pontivy@kpfilms.com

2. Purposes and Legal Basis

Linpac pursues the following purposes with its CCTV system:

- maintaining a secure and safe environment for employees and visitors;
- detecting and documenting unauthorized access to and/or stay at the monitored site;
- supporting the protection of property and other assets against burglary, theft and vandalism; and
- facilitating the enforcement of civil law claims by collecting relevant evidence.

The legal basis for the CCTV operation is our legitimate interest in safeguarding our property, our staff and our business, pursuant to Art. 6 (1) lit. f GDPR.

Linpac is not processing CCTV data for automated decision-making including profiling in accordance with Art. 22 GDPR. Linpac also will not use the CCTV recordings for employee evaluation or continuous monitoring, but only for the above-described purposes.

3. Categories of Personal Data

The CCTV system processes the following categories of personal data:

- an individual's outer appearance;
- the individual's location within the monitored area;
- the date and time of the individual's presence at that location; and
- the individual's behaviour while on the premises.

Linpac does not process CCTV footage for the purpose of identifying or drawing conclusions about any special categories of personal data. Linpac is also not recording any audio with the CCTV systems.

4. CCTV System Description

The CCTV system - consisting of eight cameras - are positioned throughout Linpac's premises to cover the parking lot and its entries as well as internal traffic lanes. Public roads or sidewalks are not monitored by Linpac's cameras.



5. Recordings, Access and Retention Periods

The recordings are based on an AOV concept (Always On Video), taking a picture every two seconds unless a movement is detected that triggers a 30 second video.

CCTV footage is only reviewed when an incident occurs, not systematically.

Recordings are stored for a maximum of 30 days, unless there is an incident which requires a longer storage of the recording.

The data will not be shared with any third parties, except with public authorities upon a lawful request.

6. Security Measures

Linpac has implemented technical and organizational measures to protect the personal data included in such CCTV recordings. Within Linpac, access to CCTV recordings is strictly limited as necessary.

7. CCTV signs

Signs regarding the presence of CCTV cameras are displayed prominently at Linpac premises to inform employees and visitors of the CCTV recording.

8. Your Privacy Rights

You have the following rights in accordance with applicable data protection laws:

- The right to request information about our use of your personal data;
- The right to access your personal data;
- The right to rectify (correct, update or modify) the personal data we hold about you;
- The right to erase (delete);
- The right to restrict our use of your personal data;
- The right to object to our use of your personal data; and
- The right to data portability.

If you would like to exercise any of these rights, please send us an email to surete.pontivy@kpfilms.com.

You also have the right to lodge a complaint with a supervisory authority.

The competent supervisory authority for Linpac is the CNIL (Commission nationale de l'informatique et des libertés), located at 3 Place de Fontenoy, 75007 Paris, France. You may also lodge a complaint with any other competent supervisory authority, for example the authority of your place of residence.

9. Contact Information

For any questions related to this CCTV Privacy Notice or to exercise any of your data subject rights as explained above, please contact: surete.pontivy@kpfilms.com