

GENERAL INFORMATION CLAUSE ON SURVEILLANCE IN THE COMPANY BIOGENED S.A.

Based on Article. 22² §8 in conjunction with Article 22³ §4 of the Act of 26 June 1974 The Labour Code - BIOGENED S.A. informs that on the premises of the company in Łódź at 99 Pojezierska Street:

✓ **there is a 24-hour system of video surveillance cameras**, recording the image of people entering / leaving, moving between buildings or entering / leaving the premises of the company. Surveillance covers the surroundings up to the fence, building entrances, access roads, pavements and entrance gate, as well as storage rooms, a corridor leading to the raw materials and packaging warehouse, the IT Department room and the Production Department rooms. The cameras are visible and not hidden in any way;

✓ **there is a 24-hour GPS tracking system** installed in company vehicles and laptops, made available to employees in connection with the work performed.

The applied surveillance forms are necessary from the point of view of the legitimate interests of the employer and are aimed at ensuring the safety of employees or the protection of the property of the employer, employees, contractors, customers and third parties, located on the premises of the workplace, as well as control of the production of goods manufactured by BIOGENED SA, keeping confidential information, the disclosure of which could expose the employer to damage, and ensuring the organisation of work enabling full use of working time, proper use of work tools made available to the employee, including in particular company vehicles and laptops. The information collected as a result of the GPS tracking system is necessary to increase work safety and enable the detection of behaviour harmful to the company or exposing it to any loss, and will not be used for any other purpose. Detailed principles of the surveillance operations are set out in the Surveillance Regulations.

BIOGENED S.A. informs that in accordance with Article 4(14) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (Official Journal EU L 119, p. 1), hereinafter abbreviated as "GDPR", the facial image, which has been processed using special technical means for the purpose of unambiguous identification, constitutes biometric data, which also constitute personal data. Therefore, we kindly explain:

I. Personal Data Controller:

BIOGENED S.A. with its registered office in Łódź, ul. Pojezierska 99, 91-342 Łódź, is the Controller of your personal data in the form of your image recorded with the use of surveillance cameras.

II. Data Protection Officer:

We have appointed a Data Protection Officer whom you can contact regarding the protection of your personal data at the following e-mail address: iod@biogened.pl or in writing to the address of BIOGENED S.A., given in point I.

III. Scope of data processed:

As the Personal Data Controller, we process your data in the form of an image of your person (including facial image), as well as in the form of specific features of the person, identification numbers of things (e.g. vehicle registration numbers, vehicle side numbers, etc.). If your facial image is processed using special technical means to uniquely identify you, then it becomes a biometric data. The processing of the employee's biometric data is also permissible when providing such data is necessary for the control of access to particularly important information, the disclosure of which may expose the employer to damage, or access to rooms that require special protection. In the case of data processed by the GPS tracking system in motor vehicles, the processed data also include the location and speed of the vehicle, and the fact that the engine is turned on or off.

IV. Purposes and legal basis of processing:

The purposes of processing your personal data recorded by the surveillance system have been specified. As the Controller, we will process these data for the purposes indicated above, and the basis for their processing in the case of your image are the provisions of the Act of 26 June 1974 The Labour Code (legal basis under Article 22² in conjunction with Article 22³ § 4 of the Labour Code), and in the case of biometric data - the legal basis under Article 22^{1b} §2 of the Labour Code. The applied surveillance forms are also necessary from the point of view of the employer's legitimate interests (legal basis - Article 6 (1) (f) of the GDPR) and are aimed at ensuring the safety of persons and property on the premises under surveillance. If you consent to sharing your image also for other purposes, then the legal basis for image processing will also be Article 6 (1) (a) of the GDPR.

V. Data retention period:

Your image captured with the use of the video surveillance cameras or GPS tracking system will be retained for a period no longer than necessary for the purposes for which the data are processed, in particular for a period no longer than 3 months from the time of recording in a form that allows identification of the person. In the event that the image recordings constitute evidence in legal proceedings or the employer has learned that they may constitute evidence in the proceedings, the data processing period shall be extended until the final conclusion of the proceedings or until the claims are time-barred.

VI. Data recipients:

Access to your personal data in the form of an image may be provided to our subcontractors (processors), IT specialists, property and personal loss adjusters, property protection agency, HR and payroll company, a law firm, and in particularly justified cases, also public authorities and law enforcement services as well as persons who demonstrate the need to gain access to the recordings, e.g. people injured in situations recorded by the video surveillance cameras.

VII. Rights of data subjects:

According to the GDPR, you have the following rights:

- a) the right of access to the recordings and to obtain copies thereof in particularly justified cases;
- b) the right to anonymise your image recorded on the video carriers and/or erase data that concern you;
- c) the right to restriction of data processing;
- d) the right to lodge a complaint with the supervisory body - the President of the Personal Data Protection Office.

VIII. Information on the requirement or voluntary provision of data:

Making available your personal data in the form of an image recorded by means of the video surveillance system is required to ensure the safety of persons and property and proper organisation of work and it is a condition for the employer's performance of a contract you are or will be a party to.

IX. Automated decision-making:

Your personal data will not be processed in an automated manner and will not be profiled.

Furthermore, I declare that I have read the provisions of the Surveillance Regulations, I have fully understood the content thereof and I undertake to comply with the rules contained therein.