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Rules on the use of video surveillance

1 INFORMATION ON REVISION

This is a new revision of the document.

2 LEGAL BASIS

The Law on Occupational Safety (OG No. 71/14, 118/14, 154/14, 94/18, 96/18) (hereinafter: "LOS") stipulates that the employer uses video surveillance as a means of occupational safety.

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 (hereinafter: the "Regulation") and the Law on the Implementation of the Regulation (OG No. 42/18) (hereinafter: the "ZIR"), provide for the processing of personal data of employees by the employer by use of a video surveillance system.

The Labor Act (OG No. 93/14, 127/17, 98/19) (hereinafter: "LA") stipulates that personal data of employees can be processed when it is determined by LA or another law or if necessary for the purpose of exercising the rights and obligations arising from the employment relationship, i.e. in connection with the employment relationship. Also, the LA stipulates that in its Labor Bylaw the employer must pre-determine which data will be processed for such purpose. The current Labor Bylaw of the company ERICSSON NIKOLA TESLA jsc (hereinafter: "ETK") provides that the processing of personal data of employees, among other things, includes data collected by video surveillance.

These Rules regulate the use of video surveillance in accordance with the LOS, Regulation, ZIR and LA in the business premises of ETK at the address Zagreb, Krapinska 45 (hereinafter: "Location"), and, also, supplement ETK Labor Bylaw.

3 DETAILS ON THE USE OF THE VIDEO SURVEILLANCE

Informing the employees

ETK employees were in advance informed of the introduction of video surveillance at the Location. Also, during the employment process, ETK takes to notify all its new employees in writing about the use of video surveillance at the Location.

Purpose and surveilled premises

Video surveillance is used to control entering and exiting the work premises and access spaces at the Location, in order to protect property and persons at the Location, the latter especially in terms of reducing the exposure of ETK employees to robbery, burglary, violence,



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theft and similar events at work or work-related situations. Video surveillance does not include public areas or rooms for rest, personal hygiene and changing.

Data protection impact assessment

With regard to the use of video surveillance, a data protection impact assessment has been carried out within the meaning of Article 35 of the Regulation.

Sign that the Location is under the video surveillance

Location entrances are equipped with signs that certain parts of the Location are under video surveillance. These signs are visible before entering the recording perimeter.

Signs, also, contain all relevant information in accordance with the Article 13 of the Regulation, in particular simple and easy-to-understand picture with the text providing the data subjects with the following information:

- that the premises are under video surveillance;
- information on ETK as the controller; and
- contact details of the ETK Data Protection Officer by which the data subjects can exercise their rights under the Regulation and ZIR.

The right to access data collected by video surveillance

The right to access personal data collected by video surveillance is granted only to authorized ETK employees assigned to organizational unit ETK/R (General Services), as well as authorized employees of the supplier to whom performing of certain tasks related to video surveillance on behalf of ETK is entrusted under the contract. All persons having access to data collected by video surveillance shall process and protect such data in a secure manner, keeping it confidential.

These persons shall use the recordings from the video surveillance system only in accordance with the above-mentioned purposes.

The video surveillance system is protected from unauthorized access.

An automated record system has been established to record access to video surveillance recordings, which contains the time and place of access, as well as the identification of persons who have accessed data collected by video surveillance.

Recordings obtained by video surveillance shall be kept for a maximum of six months, unless the law prescribes a longer retention period or if they are evidence in court, administrative, arbitration or other equivalent proceedings



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4 IMPLEMENTATION SUPERVISION

Supervision over the implementation of these Rules is performed by the organizational unit ETK/R (General Services).

5 APPLICATION AND PUBLISHING

These Rules shall enter into force on the eighth day from the day of their publication on the ETK bulletin boards.

These Rules will be published on the ETK bulletin boards immediately upon their adoption and then permanently available on the ETK website.

for **Ericsson Nikola Tesla jsc:**

Gordana Kovačević

Managing Director