

This Privacy Notice on Video Surveillance (hereinafter “Privacy Notice”) explains how Bolt Technology OÜ and its group companies (hereinafter “Bolt” or “We”) processes your (hereinafter “You” or Data Subject”) personal data through our video surveillance systems if they are installed in our premises.

1. Personal data we process

The personal data that is processed by the video surveillance system is images and video clips of all persons visiting the premises which are covered with video surveillance.

2. The purposes and the legal grounds for the processing of personal data

Video surveillance is carried out for the following purposes:

- Control the access to the premises and to ensure the security of the premises, including the safety of our property, information and employees.
- To prevent and if necessary, investigate unauthorised access to secure premises and protected areas.
- To prevent, detect and investigate theft and property damages or threats to the safety of the employees working in the premises.

The location and positioning of the video cameras takes into account the legitimate expectations of the data subject to their privacy.

Legal basis for processing personal data is legitimate interest.

3. Recipients

- In some circumstances we are legally obliged to share information with external recipients. For example, under a Court Order or where we cooperate with a data protection supervisory authority in handling complaints or investigations. We can also respond to requests, such as those from law enforcement agencies, when we have a good-faith belief that the response is required by law in that jurisdiction or furthers a public interest task, affects users in that jurisdiction, and is consistent with internationally recognised standards. In any scenario, we’ll always satisfy ourselves that we have a lawful basis on which to share the information, and we’ll make sure that we document our decision.
- Depending on the location of the data subject, the personal data may be disclosed to the Bolt Technology OÜ group companies and partners (local subsidiaries, representatives, affiliates, agents etc). Processing of personal data by Bolt Technology OÜ group companies and partners will occur under the same strict conditions as established in this privacy notice.
- We may use external service providers for video surveillance, e.g. a security company. Processing of personal data takes place under the contract concluded with the processor.
- We generally do not transfer your personal data outside of the European Union (EU) or the European Economic Area (EEA), nor to such third country or international organization, the level of data protection of which the European Commission has not considered adequate. If your personal data is transferred outside of the EU or EEA, such transfer of personal data will take place only upon appropriate legal basis, and we will take appropriate protective measures. You have the right to obtain additional information about the transfer of your personal data by sending the relevant request at privacy@bolt.eu.

4. Your rights

Your right of access

- you have the right to know, whether personal data concerning you are being processed or not, what is the purpose of processing and what are the categories of personal data. Besides, to whom the personal data is disclosed (especially the recipients in third

countries), for how long the personal data is retained and what are your rights concerning rectification, erasure and restriction of the processing.

Your right to erasure

- You have the right to demand erasure of the personal data concerning you when there are no legal grounds for the processing of the personal data.

Your right to restriction of processing

- You have the right to ask us to restrict the processing of your information in certain circumstances. This means that your data can only be used for certain things, such as legal claims or to exercise legal rights.

Your right to object to processing

- you have the right to object to the processing of personal data, which is processed based on the legitimate interest. Upon objection, we will no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms.

5. Retention of personal data

We retain the personal data processed no longer than necessary for the purpose for which it was collected. After the retention period, the video is automatically overwritten by new video footage.

In premises where only real-time monitoring is performed, no data is stored through the video surveillance system.

6. Dispute resolution

Disputes relating to the processing of personal data are resolved through customer support (info@bolt.eu) in the first instance. You have the right to contact Bolt's Data Protection Officer (privacy@bolt.eu). Our supervisory authority is the Estonian Data Protection Inspectorate (www.aki.ee).

7. Making this notice great

We hope you have found this privacy notice easy to understand. We take our responsibilities with your data seriously. We will continue to make changes to this privacy notice as part of our commitment to protecting your privacy and affording you even more transparency.