

# INFORMATION NOTICE ON CCTV MONITORING (the “Notice”)

Stonefort Insurance Holding SA and its group entities (“the Group” or “Stonefort Group” or “Stonefort”) has established a comprehensive data protection compliance framework in accordance with data protection legislation to fulfill its responsibilities and ensure adequate protection of the personal data of individuals it engages with.

The aim of this information notice is to inform you in a transparent manner about the CCTV monitoring which we are likely to implement with regard to the visitors and people present on our premises (whether they be our customers, prospects, agents or legal representatives of a client, as well as Stonefort Insurance Holding SA staff and its affiliates or representatives, as well as external service providers and their staff, the “Concerned Data Subjects”).

Please read this Notice carefully to understand how Stonefort handles your personal data and the measures we take to protect it.

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## 1 DATA CONTROLLER

According to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation and hereinafter referred to as the “GDPR”), the Controller of the video surveillance system is Stonefort (the “Controller”).

More specifically, Luxembourg-based Stonefort group entities as named below (under n.4) are considered as Joint Controllers as they have signed a Joint Controllers Intragroup Agreement pursuant to the GDPR defining their legal obligations in terms of data protection.

## 2 PURPOSES AND LEGAL BASIS OF THE OPERATIONS

Stonefort collects and processes video surveillance data (the “Material”) for the safeguarding of the Concerned Data Subjects (legal data base is the third parties vital interests as per article 6 paragraph 1f of the GDPR) with regard to the security of those present on Stonefort’s premises.

In addition, to the extent that a criminally punished act is destined against the Controller itself, the Material can be used for the protection of the Controller’s legitimate interests (as per article 6 paragraph 1f of the GDPR) e.g. protecting Stonefort’s property with the condition the the means of the processing are proportionate to the purpose targeted and the rights of privacy of the Concerned Data Subjects are not infringed due to processing of the Material in a disproportionate manner.

In particular, the processing of the Material is necessary in order to:

- Secure access to the Stonefort's premises;
- Ensure the safety of the Stonefort staff, clients and visitors;
- Detect and identify potentially suspicious or dangerous behaviors which may cause accidents or incidents;
- Pinpoint the origin of an incident;
- Protect the assets of the Stonefort (buildings, facilities, equipment, merchants, cash, etc,...);
- Organize and supervise the rapid evacuation of people in the event of an incident;
- be able to alert the emergency services of law enforcement authorities in good time and to facilitate their intervention; and
- for the defense, exercise, or demonstration in court of the rights and interests of Stonefort to the extent permissible.

The Material comes from cameras (see below under n.3) which are neither disproportionate in their number nor have been placed in a way that allows for the constant surveillance of Stonefort's employees infringing the last persons' privacy rights.

If in the future the Controller intends to further process the Material for a purpose other than that for which it was collected, the Controller shall provide the Concerned Data Subjects prior to that further processing with information on that other purpose and with any relevant further information as referred to in article 13 paragraph 2 of the GDPR.

### **3 CATEGORIES OF PERSONAL DATA PROCESSED AND SOURCE**

The Material comes from:

- recordings of images from surveillance cameras installed as follow :

- *12 outside peripheral cameras;*
- *5 parking cameras;*
- *1 basement / archiving room camera;*
- *4 indoor cameras at the entrance of the second and third floors (2 cameras on 2nd floor, 2 cameras on 3rd floor);*

- date and time of recordings.

The field of recording is only limited to only surface necessary to achieve the intended purposes.

Moreover, the cameras :

- Have a limited field of view to the area strictly necessary to visualise the persons preparing to access it,
- Does not cover the entire width of any pavement running alongside the building or adjacent public roads, and
- Does not capture the public road or the approaches, entrances, accesses and interiors of other neighbouring buildings which may fall within their field of vision

Finally, the cameras does not record any sound.

#### **4 CATEGORIES OF RECIPIENTS OF PROCESSED DATA**

As an insurance company, we are bound by professional secrecy rules and may share your data only under strict conditions or with your consent.

Stonefort Group consists of the following affiliate entities, all of which are legally established in Luxembourg:

Stonefort Insurance Holdings

Stonefort Captive Management

Stonefort Insurance

Stonefort Reinsurance

Hochtief Offshore Development Solutions

Steinfort Multi-Asset Fund SICAV SIF

Vintage Real Estate Holdco

Steinfort PropCo

Beggen PropCo

The shareholder of the Group is Hochtief IB&RMS, i.e. a company legally established in Germany and the ultimate shareholder of the Group is a listed company also legally established in Germany (Hochtief AG).

Stonefort Group entities have in place contractual arrangements that may entail processing of the Material only in line with the purposes established above (under n.2).

Stonefort does not share your data with its service providers. The service provider in charge of the processing of the Material handles only the maintenance of the systems needed for the Material without the possibility to have access to the Material apart from the reasons of proper and regular maintainance.

No transfer of the Material to an intragroup entity out of the EEA or profiling takes place with regard to the Material.

Stonefort is also obliged to share your data if included in the Material when the obligation of the professional secrecy is lifted by the law and in particular with regard to the competent police or judicial authorities acting in the context of a criminal proceedings, or any other proceedings if Stonefort needs to defend its interests in court.

#### **5 RETENTION PERIOD**

The video recordings are kept for a maximum period of eight (8) days.

The video recordings may exceptionally be kept for a period of 30 days. However, the reasons justifying such a retention period must be indicated in the processing register.

The video recordings can be kept for a longer period (beyond the above mentioned deadlines) in the event of an incident, infringement or ongoing legal proceedings until the fulfillment of the intended purpose (end of investigation; final court decision; ...)

The maximum retention period of eight (8) days is justified by the activity of Stonefort, the risks inherent in this activity (both for visitors and staff and generally any person present on the premises of Stonefort) and the need to have sufficient time to be able to professionally trace and investigate criminal activities, incidents or claims such as:

- theft or embezzlement of funds;
- fraudulent or criminal use of means of payment;
- identification of the premises before a burglary or other criminal operation;
- assault or armed robbery;
- damage.

All the above criminally punished infractions can be perpetrated against any of Stonefort's employees, agents, visitors and counterparties or against Stonefort itself based on the protection of the Controller's legitimate interests. In the last case, the Controller's legitimate interests are considered compatible with the privacy rights of the Concerned Data Subjects given their proper installation on Controller's premises on certain angles so as to be useful only for the purpose for which the Material was collected (protection of persons on the premises) and not for other purposes (e.g. having to do with Employees' work performance).

## 6 YOUR STATUTORY RIGHTS

Under the GDPR, you have the following rights regarding your personal data:

- **Right to information** - Hoping that this Notice has answered your questions, you can contact Stonefort's Data Protection Officer (DPO) for any additional information at [dpo@stonefort.com](mailto:dpo@stonefort.com).
- **Right of access** - You can access your data by contacting the Stonefort's DPO. Please note, however, that Stonefort processes a large amount of data and in accordance with the law, you may be asked to specify, before any provision of data, which data or which processing operations your request relates to.
- **Right to rectification** - You can ask the Group to rectify, correct or update inaccurate and/or incorrect data.
- **Right to lodge a complaint** with the local data protection authority if you believe that we have not complied with applicable data protection laws:  
National Data Protection Commission (CNPd)  
Telephone: (+352) 26 10 60 -1  
Email: [info@cnpd.lu](mailto:info@cnpd.lu)  
Website: <https://www.cnpd.lu>  
Address: 15, Boulevard du Jazz, L-4370 Belvaux

Stonefort may continue to process certain personal data in accordance with applicable law even if you exercise your rights, particularly where there are legitimate and compelling reasons to do so.

You also have the right to :

- **Right to request the limitation** of the processing of your data.
- **Right to object or restrict processing** of your data for prospecting purposes or for any other legitimate reason (unless there is a legitimate and compelling reason for Stonefort to continue the processing)

To exercise any of these rights, please contact Stonefort's Group DPO at [dpo@stonefort.com](mailto:dpo@stonefort.com)

## 7 DATA PROTECTION OFFICER

Stonefort has appointed a Data Protection Officer. If you have concerns or questions regarding this Notice or if you would like to exercise your rights as a data subject, please contact your Data Protection Officer at [dpo@stonefort.com](mailto:dpo@stonefort.com) .

## 8 FOR ALL REQUESTS

For all your requests, please attach a copy of your identity document, so that we can identify you. This Notice may change to better protect your personal data. The latest version in force can be consulted on the website of Stonefort : [www.stonefort.com](http://www.stonefort.com)