

**REGULATIONS FOR OPERATING VIDEO MONITORING
IN THE CHOCHOŁÓW THERMAL BATHS COMPLEX
CHOCHOŁÓW 400, 34-513 CHOCHOŁÓW**

§ 1

1. These regulations (hereinafter referred to as the "Regulations") define the goals and principles of operation of video monitoring in the Chochołów Thermal Baths complex, located at: Chochołów 400, 34-513 Chochołów (hereinafter referred to as the "Facility" or "Complex"), which is owned and administered by Chochołowskie Termy spółka z ograniczoną odpowiedzialnością with its registered office in Chochołów (34-513) Chochołów 400, entered into the register of entrepreneurs of the National Court Register kept by the District Court for Kraków - Śródmieście in Kraków, 12th Commercial Division of the National Court Register under the KRS number: 0000261672, REGON: 120300433, NIP: 7361640322 (hereinafter referred to as the "Company"), including in particular the locations of camera installations, rules for recording and saving information, data storage periods and methods of securing them, as well as the possibilities of sharing the collected data.
2. Each person using the Company's services and staying within the Complex is obliged to read the content of these Regulations and subsequently comply with their provisions.
3. The Regulations are available for viewing on the official website of the Thermal Baths and for interested persons available for individual review at the Company's headquarters (Customer Service Office).

§ 2

1. The processing of personal data registered in the monitoring system is carried out in accordance with the principles set out in the Regulation of the European Parliament and of the Council (EU) 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 the Directive 95/46/EC (hereinafter referred to as: "GDPR").
2. The Administrator of the data registered in the monitoring system is Chochołowskie Termy Spółka z ograniczoną odpowiedzialnością with its registered office in Chochołów (34-513) Chochołów 400, entered into the register of entrepreneurs of the National Court Register kept by the District Court for Kraków - Śródmieście in Kraków, 12th Commercial Division of the National Court Register Court Register under KRS number: 0000261672, REGON: 120300433, NIP: 7361640322 (hereinafter also referred to as: "Administrator").
3. The primary purpose of video monitoring is ongoing supervision of the Facility to increase the safety of people using it, by ensuring the possibility of faster staff response to a failure or an event in which a person might need help or assistance from the Chochołów Thermal Baths staff. Monitoring recordings may also be helpful if it is necessary to document the course of emergency events or the commission of a prohibited act. Therefore, the sole purpose of using video monitoring is to ensure the safety of people staying in the monitored area (including the safety of employees), order and protection of property, ensure information protection and compliance with professional secrets, as well as the possible determination, investigation and defence of mutual claims.
4. The legal basis for the processing of personal data from monitoring is Art. 6 section 1 letter f) GDPR - the legitimate interest of the Administrator consisting in ensuring the safety of the

Administrator's persons and property and protection of its rights, and when it comes to the data of the Company's employees, also Art. 222 of the Act of 26 June 1974 - Labour Code.

5. Other detailed information required by regulations regarding the principles of personal data processing as part of the video monitoring system operating in the Complex is included in the GDPR Information Clause available on the Company's official website at: <https://www.chocholowskietermy.pl>, in the tab: <https://www.chocholowskietermy.pl/polityka-przetwarzania-dani-osobch-polityka-transparentnosci-klase-informacyjne/>.

6. Employees were informed about the operation of the video monitoring system. Information for employees about the purposes, scope and method of using a monitoring in the Company, prepared on the basis and for the purpose of fulfilling the obligation specified in Art. 222 § 8 of the Labour Code constitutes an annex to the Company's Work Regulations, and each employee is familiarised with it according to the procedure in accordance with generally applicable regulations.

7. The information obligation towards persons whose personal data may be recorded during monitoring is also implemented through pictograms/information boards - the areas covered by the monitoring are marked visibly and legibly with a special sign.

§ 3

1. The video monitoring system operating in the Complex consists of:

- a) cameras recording events inside and outside the buildings included in the Complex, in a resolution enabling identification of persons/vehicle identification numbers (provided that not all cameras enable the above-mentioned identification);
- b) devices recording and saving images on a physical medium;
- c) monitors enabling viewing of recorded events;
- d) cabling and software.

2. Devices included in the recording system that meet the requirements of the standards set out in law and Polish standards for CCTV surveillance systems are used to record the image.

3. Video monitoring complements the security system implemented in the Complex.

4. Monitoring operates 24 hours a day.

5. Only the image (no sound) is subject to registration and data storage.

6. As a rule, the content of surveillance recordings is recorded without additional markings or references, allowing for the automatic assignment of individual fragments of the recordings to specific natural persons. However, it should be considered that such recordings constitute a collection of personal data containing personal data of persons whose image was recorded by means of monitoring and video and constitute an ad hoc set of "video monitoring".

7. The exception is cameras located on parking barriers, which, as LPR (License Plate Recognition) cameras, record vehicle identification numbers and allow for their automatic recognition. The identified characters are then processed and compared with the data in the database to find the appropriate information about the vehicle. In other words, the above-mentioned cameras (equipped with the ANPR function) can find the licence plate in the observed scene. Each character is then identified individually, after which the system returns the ready string of characters and saves it in the database. Thanks to an advanced AI algorithm, this technology allows you to recognise a licence plate and read its features (registration number, colour, country, etc.)

8. Additionally, the IT systems operating in the Chochołów Thermal Baths, combined with monitoring recordings, create a theoretical possibility of determining the place and time of

stay of an identified natural person using a provided transponder of the Electronic Customer Service System, including the course of events involving such a person. This process may be conducted in justified cases.

9. Personal data aggregated in the above-mentioned forms are not transferred to other databases. Access to them is strictly limited to authorised persons. Recording devices and monitors enabling viewing of recorded events are located in rooms to which only authorised persons have access.

10. All data recorded by video surveillance cameras are generally saved and stored for a period not exceeding 3 weeks from the recording date, with the reservation that the storage time may be shorter because it depends on the number of events and the capacity of the recorder's disk. When the disk space runs out, the data is automatically overwritten - the data is deleted by overwriting the data on the image recording device.

§ 4

1. Personal data contained in the video monitoring file may be made available:

- a) at the express and lawful request of authorised bodies/institutions, in particular, such as the police, prosecutor's office, courts, etc. - on the terms specified in legal provisions in the scope of the statutory tasks performed by these bodies/institutions;
- b) to the data subject, pursuant to Art. 15 GDPR as part of the exercise of his/her right of access to his/her data and the right to receive a copy of the data;
- c) to a third party who is not in the recording, but its disclosure results from the legitimate interest of that person, pursuant to Art. 6 section 1 letter f) GDPR.

2. If an application for access to data contained in the video monitoring file is submitted by authorised bodies/institutions in connection with proceedings conducted as part of the performance of statutory tasks, the application should include:

- name and address of the authority/institution;
- indication of the purpose of receiving monitoring recordings and the legal basis for requesting access to data;
- reference number/designation of the case being handled;
- date, time and place of the event (area covered by monitoring) to which the application relates and a brief description of the event;
- form of data disclosure;
- date of submission of the application;
- name, surname, job position and legible signature of the person submitting the application;
- contact details (e-mail address and/or telephone number).

3. In the event of applying for access to data contained in the video monitoring file by the data subject exercising the right of access to the data pursuant to Art. 15 GDPR, this application should include:

- name, surname and address of the person;
- contact details (e-mail address and/or telephone number);
- date, time and place of the event (area covered by monitoring) to which the application relates and a short description of this event, including a description (e.g. appearance, clothing) allowing the identification of the applicant in the recording (the person present in the recording to gain access to it must demonstrate and prove that he/she is in the recording he/she wants to obtain) and specify when the applicant (at what time/time range) was in the area covered by monitoring;
- indication of the legal basis for requesting data sharing;

- form of data disclosure;
 - date of submission of the application;
 - legible signature of the person submitting the application.
4. If an application for access to data contained in the video monitoring file is submitted by a third party who is not included in the recording, but his/her disclosure results from the legally justified interest of that person, pursuant to Art. 6 section 1 letter f) GDPR, this application should include:
- name, surname and address of the person;
 - contact details (e-mail address and/or telephone number);
 - date, time and place of the event (area covered by monitoring) to which the application relates and a brief description of the event;
 - indication of the purpose of receiving monitoring recordings and the legal basis for requesting access to data, as well as the legitimate interest in obtaining the recording;
 - form of data disclosure;
 - date of submission of the application;
 - legible signature of the person submitting the application.
5. Additional identifying data may be required to consider the application and its further implementation.
6. It is also possible to apply for protection of the video surveillance recording before its deletion after the standard storage period. The request in this matter should contain information analogous to that specified in the paragraphs above for requests for access to data. It should be submitted as soon as possible and no later than within 3 calendar days from the date the event to which the request relates could have been registered through video monitoring. Applications submitted after this deadline may not guarantee image protection due to their possible deletion from the recorder.
7. The template through which you can apply for securing/providing access to video surveillance recordings is attached as Annex No. 1 to these Regulations and is available at the Thermal Baths Customer Service Office and on the Company's website. The application must be completed legibly.
8. An application for securing/providing access to video monitoring recordings should be in writing and submitted in person to the Term Customer Service Office or sent to the address of the Company's registered office or electronically to the following address: bok@chocholowskietermy.pl, with the note: "Video monitoring - disclosure /securing the recording.

§ 5

1. Securing/providing video surveillance recordings takes place after verification of the submitted application, and each time depends on the Administrator's assessment with respect to and within the limits of applicable regulations.
2. Information about the consideration of the application for securing/providing access to video surveillance recordings will be provided to the requesting person in writing or electronically (e-mail) to the contact details indicated by that person within the time limit in accordance with generally applicable regulations.
3. The video surveillance recording is made available after anonymising or removing other persons' personal data.
4. The provision of video surveillance recordings is documented as a protocol, the template of which is attached as Annex 2 to these Regulations.

5. The person to whom the video surveillance recordings were made available should submit a statement confirming receipt of the recording, according to the template provided in Annex 3 to these Regulations.

6. Copies of video surveillance recordings for the period covered by a given application, as well as external electronic media used in the event of a need to record the material recorded as part of video monitoring on an external electronic media, shall be provided with information containing the following data:

- a) serial number;
- b) the period covered by the recording - date and time of recording;
- c) data source, e.g. cameras in the hall;
- d) date of making the copy;
- e) name and surname of the person recording the recorded data.

The medium is protected against harmful external factors and unauthorised persons.

7. The authority/person to whom the material was made available is responsible for properly securing copies of the shared material. The Administrator is not responsible for a copy of the materials provided.

8. If it is not possible to provide, at the request of the authorised entity, a copy of the recording or an external medium on which the monitoring material was recorded, or if this medium is not collected, the data is stored for a period not longer than 30 days from the date of notifying the authorised entity about the preparation copies. After this deadline, the copy will be deleted, and the medium will be physically destroyed.

9. The register of applications for securing/providing access to data contained in the video monitoring file and the register of prepared and issued copies of video monitoring is kept by the Data Protection Inspector (DPO) appointed by the Company.

§ 6

1. In all matters not regulated in these Regulations, generally applicable provisions of Polish law shall apply, including, in particular, the provisions of the Act of 23 April 1964 of the Civil Code and other relevant legal acts, as well as internal regulations in force at the Thermal Baths, including in particular the main Regulations of the Chochołów Thermal Baths Facility, specifying the organisation and rules of using the services provided by the Thermal Baths, including the rules of liability and obligations of Customers.

2. The applicable complaint procedure is described in the main Regulations of the Facility.

3. The Company reserves the right to change the provisions of these Regulations. Changes to the Regulations will be effective on the date given, along with the information about the change. The version of the Regulations that is in force at the time of using the Company's services at a given time should be considered binding for a given User (changes will apply to contracts concluded after the amended version of the Regulations enters into force).

4. The Annexes constitute an integral part of the Regulations.

5. The Regulations enter into force on 17 April 2024.