Video Surveillance and Automatic Number Plate Recognition

The Business and Distribution Centre of Kemofarmacija d.d. (PDC Kemofarmacija) is equipped with video surveillance, as well as an Automatic Number Plate Recognition (ANPR) system.

Access to the premises of PDC Kemofarmacija is allowed only to authorized persons.

Who is the operator of the ANPR system?

The operator of the video surveillance and ANPR system is Kemofarmacija d.d., Cesta na Brdo 100, 1000 Ljubljana.

Contact for information

To obtain information on where and for how long data is stored in the video surveillance system and the ANPR system, you can call +386 1 470 98 00 or write to the e-mail address info@kemofarmacija.si (with the annotation "Video surveillance or ANPR").

Categories of personal data

With video surveillance, we collect and process the following data:

- a snapshot of an individual,
- information about the location,
- date and time of the recording.

With the ANPR system, we collect and process the following personal data of individuals:

- license plate number
- entry/exit time,
- access card number (employees only).

KEMOFARMACIJA, wholesaler za skrbou zdravstva d.d., VAT ID SI90515307, TRR UniCredit Banka Slovenija d.d., SI56 2900 0000 1842 081, Swift BACXSI22, share capital € 3,674,770.80, company registration with District Court in Ljubljana, file number 10056700, registration no. 5003814000

Purpose and legal basis

Personal data within the framework of video surveillance and the ANPR system are processed for the following purposes:

- control and management of access to the business premises;
- ensuring the safety of people and property;
- recording of vehicle entry and exit;
- prevention of unauthorized access.

The legal basis for the processing of personal data is Article 6(1)(f) of the General Data Protection Regulation (GDPR) and Article 76 of the Personal Data Protection Act (ZVOP-2). For employees of Kemofarmacija d.d., the legal basis of consent referred to in the Article 6(1)(a) of the GDPR applies to the ANPR system.

Video surveillance and the ANPR system are operating in scope necessary for protection of people, assets and working process. The systems are implemented on the basis of the operator's legitimate interests, taking into account its role as an operator of critical infrastructure. Moreover, as Kemofarmacija d.d. is engaged in the distribution of medicinal products and other regulated goods, it is required to maintain an appropriate level of security and protect its premises, assets, staff, and business operations from unauthorized access and other security risks.

To achieve these objectives, Kemofarmacija d.d. monitors and controls access to and from its business premises through video surveillance and the ANPR system. These measures also contribute to the protection of trade secrets and other confidential business information. In addition, the systems enable the investigation, documentation, and resolution of security incidents, accidents, and other events that may occur within the PDC area.

The ANPR system is implemented at the entrances to the premises of PDC Kemofarmacija, where it is clearly marked with an appropriate pictorial sign and description at the entrance to the car park.

Data retention period

Video surveillance system: Recordings are kept for a maximum of three months from the moment they are created.

ANPR system: The retention period depends on the type of user:

- Employees, tenants, trucks: License plate data is stored for the duration of their access or contractual relationship, while data on the time of entry/exit are stored for a maximum of 30 days, after which it is deleted.
- Visitors: The ANPR system is generally not used for these users.

Notwithstanding the above, video surveillance system recordings and ANPR recordings may be stored for a longer period of time if so provided by law or required by a supervisory authority or in order to

PHOENIX Pharma Slovenija

KEMOFARMACIJA, wholesaler za skrbou zdravstva d.d., VAT ID SI90515307, TRR UniCredit Banka Slovenija d.d., SI56 2900 0000 1842 081, Swift BACXSI22, share capital € 3,674,770.80, company registration with District Court in Ljubljana, file number 10056700, registration no. 5003814000

protect the legitimate interests of the company (e.g. forwarding the recordings to the insurance company in the event of an accident). Data may also be stored longer if the data is subject to judicial, administrative or other proceedings.

Users of personal data

The video surveillance system and the ANPR system are managed by authorized persons of the operator (staff and external security contractor). In certain cases, the recipient of the data may also be the police, insurance company or other institution to which the operator provides personal data, of course, provided that there exists an appropriate legal basis.

Unusual further processing

Non-standard processing, such as transfers to third countries, audio (voice) recording and automated decision-making, are not be carried out. The processing is carried out only for the purposes stated in this notice and there are no special effects of the processing or further processing.

What are your rights in relation to personal data?

In accordance with the GDPR and other applicable regulations regarding the protection of personal data, you have the following rights:

- You have the right **to access information** about your personal data that is processed (*Art. 15 GDPR*).
- You have the right to request **the rectification of** data that is incorrect (*Art. 16 GDPR*).
- In the cases referred to in Article 17 of the GDPR, you have the right to request that personal data be **erased**.
- In accordance with Article 18 of the GDPR, you have the right **to restrict the processing** of your personal data if one of the reasons listed in this Article applies.
- In accordance with Article 20 of the GDPR, you have the right to receive your personal data in a structured and machine-readable form, and you have the right to transfer this data to another person without hindrance under certain circumstances.
- In accordance with Article 21 of the GDPR, you have the right **to object to processing** in certain cases if the reasons are related to your particular case.

The competent state authority for the data protection is the Information Commissioner, Dunajska cesta 22, 1000 Ljubljana, Slovenia, gp.ip@ip-rs.si. You can exercise your right to lodge a complaint with a supervisory authority with this authority.

PHOENIX Pharma Slovenija

KEMOFARMACIJA, wholesaler za skrbou zdravstva d.d., VAT ID SI90515307, TRR UniCredit Banka Slovenija d.d., SI56 2900 0000 1842 081, Swift BACXSI22, share capital € 3,674,770.80, company registration with District Court in Ljubljana, file number 10056700, registration no. 5003814000