

I. PREAMBLE

This policy describes that all premises where Credins Bank conducts its business are supervised by CCTV cameras, as a personal data controller, including but not limited to the following: (Head Offices, Branches, Agencies, ATMs) etc.

This policy outlines also the technical and organizational measures that will be applied to ensure reliability and protection of personal data by data processing through surveillance cameras, the period during which video recordings are stored, the manner of deletion, and the rights and obligations of persons authorized to access the camera surveillance system.

II. LEGAL GROUND:

This policy is based on the following:

- Law No. 19/2016 "On additional public security measures"
- Law No. 9887, dated 10.03.2008 "On protection of personal data", as amended.
- Guideline No.46, date 28.03.2017 "On determining security level for the processing of personal data through security systems, pursuant to the Law No. 19/2016 "On additional public security measures"
- Guideline No.3, dated 05.03.2010 of the Commissioner for the Right to Information and Protection of Personal Data "On the CCTV Surveillance system in buildings, bars and other premises", as amended.

III. PURPOSE OF PROCESSING DATA THROUGH SURVEILLANCE CAMERAS

Pursuant to law no. 19/2016 "On additional public security measures" and according to the Law no. 9887 dated 10.03.2008 "On personal data protection" as amended, Credins Bank monitors its premises through surveillance cameras.

The installation of the cameras is carried out in such a way as to fulfill the purpose of Credins Bank's policies to insure the bank's staff, customers and property from an obvious risk.

IV. PROCESSING PERSONAL DATA THROUGH SURVEILLANCE CAMERAS

The Bank ensures a high security system for protecting and further processing the data processed through camera surveillance, in full compliance with the provisions of law no. 9887/2008 "On Personal Data Protection", as amended, as well as in compliance with the bylaws issued for its implementation

No information processed by camera surveillance systems shall be communicated or disclosed unless the

information is requested by the competent authorities which acquire this right by special law in compliance with the requirements of the law.

Persons authorized at the Bank for processing and administering data through camera surveillance systems make available visual materials or other data, which are acquired by using additional security measures, at the request of the State Police or the judiciary, only for investigation purposes, pursuant to the Criminal Procedure Code and the legislation in force.

The Bank employees are subject to the obligation for maintaining confidentiality of the information provided to the latter to exercise its functions in accordance with the Law, and they can disclose it only to the competent authorities in accordance with Article 13 of the Law "On additional public safety measures". The integrity of the employees is assessed by the Bank before they are hired.

The Bank monitors compliance of its employees with their obligations regarding the security of the information processed by them.

The party responsible for handling personal data is "CREDINS Bank" JSC with its Head Offices in Rr. "Vaso Pasha", No.8, Tirana, Albania.

V. CATEGORIES OF DATA SUBJECTS PROCESSED AND BASIC RULES

Surveillance cameras process data of various categories of personal data subjects within the bank, including but not limited to the following (Customers/Employees/Suppliers/etc.).

Some of the rules for installing cameras in the bank premises are as follows:

- The camera system should not violate the fundamental rights of the individual by interfering in his/her private life.
- Security measures must be complete to protect the data obtained from the recording, processing and storage of such data.
- Information signs are placed at the entrance of the bank premises, monitored by surveillance cameras, to inform the data subjects about the surveillance system according to annex 1.
- Cameras are not installed in spaces such as toilets, locker rooms, closets or other similar environments.
- Cameras may be installed in staff workplaces only to survey for security reasons.

VI. USE OF CAMERA SURVEILLANCE SYSTEM

- Monitoring through surveillance equipment is performed by the Branch Manager and the Security Unit (Central Monitoring Room) at Credins Bank.
- The equipment for recording images is placed in a safe place at the branch and in the Central Monitoring Room at the Head Offices of the bank.
- The images obtained from the camera system and the recorded information are checked only by the personnel of the Electronic Security Sector at the Security Unit.
- In cases when access to personal data is required from the camera recording whenever there are complaints related to the ATM service or at the counters, the data subject submit a written request, which states the reason and time when the event occurred. The request is administered by the branch manager and the Security Unit, ensuring the right of access and the right of data processing by the bank.
- In certain cases when the data must be disclosed pursuant to Article 13 of Law no. 19/2016 "On additional public security measures", the materials obtained from the security cameras are made available to the relevant institutions. The Security Directorate takes rapid actions to provide the relevant responses to these institutions.
- Electronic Security Sector personnel who have knowledge of the data checked or processed, are obliged to maintain confidentiality and reliability even after the completion of the function.
- When passive protection systems do not work, the branch manager should immediately notify the Electronic Security Sector through camera surveillance systems, to repair the defect and to enhance protection measures. Notification and condition of the defect for the malfunctioning of the camera system or alarms, until their repair, must be kept secret for the staff of the bank unit
- The Chief of the Electronic Security Sector/Director of Security Unit must inform the Office of the Commissioner for the Right to Information and Personal Data Protection, in case of unauthorized compromise, manipulation or modification of the system as well as in case of data are disclosed according to Article 13 of Law no. 19/2016 "On additional public safety measures".

VII. AREAS COVERED BY THE CAMERA SURVEILLANCE SYSTEM

Credins Bank monitors on a constant basis by surveillance cameras in its business facilities the following:

- Exterior surfaces of the bank's facade.
- Entrance to the interior premise/hall/meeting room.
- Customer area, counter and the tellers' area.
- Area where the cash is stored and administered (entrance and indoor premise).
- Area where the documents are stored and administered (entrance and indoor premise).
- Area where information technology systems are located (entrance and indoor premise).
- Area around generators.
- Area around ATMs.
- Parking
- Elevators
- Cash escort route (CASH route).

VIII. TERMS FOR STORING PERSONAL DATA

The personal data of the subjects are processed in the CCTV surveillance camera systems in full compliance with the security measures defined in the provisions of Law no. 9887, dated 10/03/2008 "On the protection of personal data", as amended.

The information recorded on DVR is confidential. This information is stored for a period of **15 (fifteen) - 60 (sixty) days**.

The bank protects the data in secure premises and systems until the expiration of the set deadline. Then the data is automatically deleted from the surveillance system.

IX. ACCES TO PERSONAL DATA

CREDINS Bank tries to be as open as possible to give individuals access to their personal data. Personal data subjects can be informed whether we have personal data obtained from camera surveillance systems by sending us a "request for access to personal data" and pursuant to Law No. 9887/2008 "On the protection of personal data", as amended, the bank shall provide information on the data within the legal deadline or explain the reason for not providing the relevant information.

In this context, to fulfill our legal obligation, we shall:

- provide information why we keep them and inform you if the personal data processing is mandatory or voluntary;
- give the data subject the opportunity to consult the relevant data processing only with the responsible unit that administers their data.

If you want to have access to any personal data that we may have, as well as for any right that you may have in the capacity of data subject in accordance with Law no. 9887/2008 "On Protection of Personal Data", as amended, you are deemed to submit a request to the bank by providing your legal identification documents.

X. RIGHTS OF THE PERSONAL DATA SUBJECT

Individuals whose personal data are processed, in accordance with Law no. 9887/2008 "On the Protection of Personal Data" as amended, are entitled to verify the existence or not of personal data and to know their content and source, to verify the accuracy, update or correction, to request information for processing purposes, about the categories of personal data processed, as well as in any case to oppose, for lawful reasons, their treatment. The Bank provides information about the lawful processing of data, as well as about any rights it reserves as a data subject in accordance with Law no. 9887/2008 "On Protection of Personal Data", as amended.

XI. HOW TO CONTACT US

Requests for information regarding our camera surveillance policy can be sent by e-mail to info@bankacredins.com and you may also appear at the counters of "CREDINS" sh.a. to complete the relevant form.

XII. FINAL PROVISIONS

In case of misuse or violation of privacy by camera surveillance systems, data subjects have the right to complain to the **Commissioner for the Right to Information and Personal Data Protection** at the following addresses:

Green Number 0800 20 50 / www.idp.al / info@idp.

ANNEX 1

Model Nr.2

ZONË E MBIKËQYRUR ME KAMERA



Subjektet e të dhënave personale, mund të ushtrojnë të drejtat e tyre sipas ligjit nr. 9887 dt. 10/03/2008 “Për Mbrojtjen e të Dhënave Personale”, i ndryshuar pranë:

(Emri i Kontrolluesit)

Subjekt i ligjit nr.19/2016 “Për masat shtesë të sigurisë publike”

(Kontaktet e Kontrolluesit)

Në rast keqpërdorimi të të dhënave personale apo cënim të privatësisë nëpërmjet sistemit të kamerave, subjektet kanë të drejtën të ankohen pranë:

Komisionerit për të Drejtën e Informimit dhe Mbrojtjen e të Dhënave Personale

Nr. i Gjellbër: 0800 20 50 www.idp.al info@idp.al