

1. Introduction and summary

- 1.1. For the safety and security of its buildings, assets, staff and visitors, VARO Energy B.V. (hereafter: “**VARO**”) operates a video-surveillance system (also known as CCTV). This Policy, describes the use of video-surveillance by VARO, safeguards that VARO takes to protect the personal data, privacy and other fundamental rights and legitimate interests of those caught on the cameras.
- 1.2. This Policy aligns with the requirements of applicable laws and regulations, in particular the General Data Protection Regulation 2016/679 (“**GDPR**”). This Policy is applicable within the VARO group. Where applicable, local amendments may be issued from time to time, laying out more specific rules (that shall prevail over this Policy in the event of inconsistency).

2. What personal information is collected and for what purpose

- 2.1. VARO uses a video-surveillance system for the sole purposes of security and access control. The video-surveillance system helps control access to our building and helps ensure the security of our building, the safety of our staff and visitors, as well as property and information located or stored on the premises. It complements other

physical security systems such as access control systems and physical intrusion control systems. It forms part of the measures to support our broader security policies and helps prevent, deter, and if necessary, investigate unauthorised physical access, including unauthorised access to secure premises and protected rooms, IT infrastructure, or operational information. In addition, video-surveillance helps prevent, detect and investigate theft of equipment or assets owned by VARO, visitors or staff, and threats to the safety of visitors or personnel working at the office (e.g. fire, physical assault).

- 2.2. The system is not used for any other purpose, for example, it is not used to monitor the work of employees or to monitor attendance. Neither is the system used as an investigative tool (other than investigating physical security incidents such as thefts or unauthorised access).

3. Lawful grounds for video-surveillance

The use of video-surveillance by VARO is necessary for ensuring the safety and security of its buildings, premises, assets, staff and visitors. Therefore, VARO has a legitimate interest for the video-surveillance where less intrusive measures are not sufficient to mitigate these risks.

4. How long do we keep the data

The images are retained for a maximum of four weeks (for Switzerland – 3 days, and for Germany – one week). Thereafter, all images are deleted. If any image needs to be stored to further investigate or evidence a security incident, they may be retained as necessary.

5. How do we provide information to the public

We provide information to the public about the video-surveillance in an effective and comprehensive manner. To this end, we follow a multi-layer approach, which consists of a combination of the following two methods:

- ▶ on-the-spot notices to alert the public to the fact that monitoring takes place, and
- ▶ we post this Video-surveillance Policy on our internet site for those wishing to know more about the video-surveillance within VARO. ^[1]_{SEP}

6. Transfers and disclosures

No permanent access to video-surveillance is given to management or human resources.

It is only in exceptional circumstances that the images may be transferred to

investigatory bodies in the framework of a criminal investigation. Requests for access to video-surveillance recordings by authorities shall only be granted if there is a legal obligation and those transfers shall be documented.

VARO may and shall only give access to video-surveillance to third parties that have been granted the task to ensure the security and safety of the premises, buildings, staff, visitors and goods. All access will be provided in accordance with all relevant privacy obligations.

All transfers and disclosures are documented and subject to an assessment of the necessity of such transfer and the compatibility of the purposes of the transfer with the initial security and access control purpose of the processing.

For any questions about this policy or the use of video-surveillance by VARO please contact privacy@varoenergy.com