

**WORKPLACE SURVEILLANCE POLICY**  
**Policy Statement on CCTV**  
***Waste4ME B.V.***

**I. Objective and scope of the video-surveillance policy of Waste4ME B.V.**

**Purpose of the Policy:** The purpose of this policy is to ensure that a transparent and trustable environment exists within Waste4ME B.V. with regards to surveillance focused on WER Unit and that Waste4ME B.V. complies with the applicable legal requirements.

**Background of the Policy<sup>1</sup>:** Waste4ME B.V. recognizes the risk of possible of safety and security issues that may arise in relation to the operation of WER Unit in the Facility. WER Unit's operation involves chemical reactions and high temperature. Facility in Moerdijk is a work environment accessible to the employees and visitors of Waste4ME B.V.. Waste4ME B.V. wants to and obliged to ensure the safe and proper operation of WER Unit, safety of the Facility, its employees and visitors. Accordingly, Waste4ME B.V. has put in place a CCTV Camera Surveillance system in the Facility. Waste4ME B.V. is aware that such system might involve processing of personal data, therefore Waste4ME B.V. has taken measures to consider the balance between the interests and rights of employees and visitors against its own interests.

**Scope:** This policy applies to all employees, supervisors, operators, visitors, consultants, contractors and volunteers in the Facility.

**Responsibility:** Waste4ME B.V. (Sisalbaan 13, Office 1.07, 2352 ZA Leiderdorp, The Netherlands) is responsible for the collection, processing and use of personal data obtained from Camera Surveillance as described in the GDPR. If there is any question about the content of this policy, the collection, processing or use of personal data by Waste4ME B.V. in accordance with this policy, an email or letter can be sent to the following contact address:

**Waste4ME B.V.**  
Sisalbaan 13, Office 1.07  
2352 ZA Leiderdorp, The Netherlands  
Email: [info@waste4me.com](mailto:info@waste4me.com)

**Policy:** This policy describes the current CCTV video-surveillance system and the measures taken by Waste4ME B.V. to protect personal data, privacy and the other fundamental rights.

---

<sup>1</sup> This policy is prepared in light of the "EDPB Guidelines 3/2019 on processing of personal data through video devices" adopted on 10 July 2019.

This policy is also a notification in accordance with the applicable laws, and existing and new employees consent to all such surveillance taking place.

## II. Definitions

**CCTV** is closed-circuit television camera that can produce images or recordings.

**Camera Surveillance** is surveillance by means of a CCTV camera that monitors or records visual images of activities on premises or in any other place.

**Workplace** means premises, or any other place, where Waste4ME B.V. employees work, or any part of such premises or place.

**At Work**, means the workplace of the employer (or a related corporation) whether or not the employee is actually performing work at the time, or at any other place while performing work for the employer.

**Surveillance Information** means information obtained, recorded, monitored or observed as a consequence of Camera Surveillance.

**Facility** means the separate space in the hangar that is designated to Waste4ME B.V. and where WER Unit is located in Oostelijke Randweg 48, Moerdijk, 4782 PZ the Netherlands.

**WER Unit** means the unit developed by Waste4ME B.V. as well as other related machines, components, equipment that enables Waste4ME B.V. operation.

**Proper Functioning/Operation** means the functioning or operation of the WER Unit in accordance with its User Manual.

**GDPR** is the Regulation (EU) 2016/679 of the European Parliament and of the Council 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 Directive 95/46/EC (General Data Protection Regulation).

**Data Subject** means an identified or identifiable natural person in the Surveillance Information.

## III. Type and Technical Specifications of Surveillance System

**Type of surveillance:** Camera Surveillance (CCTV).

**Type of recording:** Camera Surveillance records digital images. The recordings are limited only to images without audio. Camera Surveillance records movements detected by the CCTV cameras in the areas under surveillance, and the date, time, location. The CCTV cameras function 24 hours a day, 7 days a week. The CCTV cameras are fixed. CCTV cameras have wide angle and capacity to optically zoom in on a location. There is no use of covert surveillance or 'speech-enabled surveillance cameras'. The recordings are kept on local drive and backed-up on the secured cloud folder, and regardless of the storage destination, the recordings are not retained more than 4 weeks.

**Overview of Camera Surveillance system:** It consists of devices as well software for capturing images of an area, handling the images and displaying them to an operator. Videos are captured through cameras, connection cables, digital networks, and wireless transmissions. There are fixed screens that enables to see Surveillance Information. Surveillance Information is remotely accessible by Waste4ME B.V..

**Remote access:** Surveillance Information is not open to public or there is no open access to it. The remote access is possible through a secure system in which technical safeguards are in place. From time to time, there might be remote access via internet to the Surveillance Information, however, this access is limited only to authorized staff of Waste4ME B.V. and purposes set out below.

**Why Camera Surveillance:** Firstly, this measure is suitable to attain the desired goals, and secondly it is adequate and necessary for its purposes. Below stated purposed could not reasonably be fulfilled by other means which are less intrusive to the fundamental rights and freedoms of the employees. The video recordings and real time monitoring are necessary to observe the operation of WER Unit, provide help and improvements when it is necessary to detect any possible problems in the operation of WER Unit and ensure the health and safety of the work environment. Storage of the Surveillance information for the storage period is necessary to enable proper analysis in case of malfunctioning and detecting the stages of a possible malfunctioning in that time-frame without hesitation. Back-up on cloud is necessary because in the case of a possible accident/incident or malicious deliberate act that causes the destruction of the Camera Surveillance or the local devices in the Facility, Waste4ME B.V. can detect the cause for such destruction and take necessary steps. This also helps Waste4ME B.V to ensure the availability of the data. However, Waste4ME B.V. implements certain technical and organizational solutions explained below to minimize collection of personal data and ensure the proportionality between the risks faced, measures taken and privacy of data subjects.

#### **IV. Personal Information Collected, Locations under Camera Surveillance and the Purposes for its Collection**

**Personal information collected:** The video recordings and image quality can enable persons to be identified depending on the siting of the installed CCTV camera.

**Locations under Camera Surveillance:** The Camera Surveillance system covers:

- i. Inside the hangar allocated for the use of Waste4ME B.V.  
Objective: to enable whole and in detail monitoring of WER Unit to ensure safe and proper operation of the WER Unit.
- ii. Emergency exits  
Objective: to deter and detect any attempt to gain access and offensive behaviour.
- iii. Entrances to the Facility  
Objective: to deter any attempt to gain access and to deter offensive behaviour, safe operation of the WER Unit components and to assist in the resolution of disputes in that regard.

- iv. Delivery platforms and equipment storage area  
Objective: to monitor deliveries and the access to the delivery platforms and the equipment storage area, protection of sensitive technical installations.

**Purposes:** Waste4ME B.V. recognizes the duty of care it owes to employees and visitors under the Dutch Law. Therefore, it uses Camera Surveillance to maintain safety and security standards. The Camera Surveillance system is implemented to monitor access, operation, safety and security (of persons, building, WER Unit and information). In more detail, Camera Surveillance is installed:

- to safeguard the health and safety of the employer, employees, and visitors;
- for security of the premises, buildings, sites, objects and operations during and before/after operational hours;
- for protection of property and other assets (such as theft or damages or serious incidents);
- ensuring proper and safe operation of the WER Unit where liability may arise;
- for maintenance of the WER Unit which then can be linked to insurance and guarantee specifications;
- to protect business interest of Waste4ME B.V. (such as misconduct, or misappropriation of intellectual property and business secrets, by employees or members of the public) and ensure that Waste4ME B.V. policies are not broken;
- to provide online support on WER Unit with the help of real time monitoring to detect and fix the possible misuse, malfunctioning and issues and/or improve productivity;
- protect operations against fraud or other criminal activity and detect such activity in the Facility;
- investigate accidents and/or incidents occurring in the Facility; and
- to comply with legal and regulatory obligations.

**Limitation of scope:** Camera Surveillance is used only for the purposes indicated above. Waste4ME B.V. clearly declares that it will not collect or use the personal data for any other purposes than those explicitly mentioned. Waste4ME B.V. will not use the Surveillance Information to assess the work of staff; to check their presence; for disciplinary purposes; for monitoring performance of the employees or to map an individual's habits.

## V. Legitimacy and Legal Basis of Camera Surveillance

Waste4ME B.V. attaches importance to process all personal data lawfully, fairly and in a transparent manner. It does not want to exceed what is adequate, relevant and limited to what is necessary in relation to the purposes for which data are processed. This means that Waste4ME B.V. must justify its purpose for obtaining and using personal data by electronic means of Camera Surveillance System. In managing identified risks, Waste4ME B.V.'s use of CCTV is justified and will be proportional to above stated purposes.

The use of Camera Surveillance, as it is operated by Waste4ME B.V., complies with Article 6(1)(f) of the GDPR. Legitimate interests of Waste4ME B.V. for processing personal data include the prevention and detection of crime, safeguarding staff and visitors, ensuring compliance with health and safety procedures, and improving productivity.

## VI. Measures to Ensure the Surveillance Proceed in Accordance with the Purposes Set out

Waste4ME B.V. values ensuring the intrusion of privacy is as small as possible. In order to ensure the CCTV is not used for any other purpose rather than stated above, the following measures are taken:

- a. **Placement of the cameras:** The CCTV camera system is open monitoring system that means the cameras used for surveillance (or any equipment that would generally indicate the presence of a camera) are clearly visible in the place where the surveillance is taking place, and signs notifying people that surveillance taking place in the Facility are clearly visible at the entrance to the Facility. Waste4ME B.V. does not have or intended to have any system for covert surveillance (that is any surveillance that is carried out without the knowledge of the employee or other data subjects).  
Cameras are positioned in strategic points that enable the monitoring of the WER Unit, thus number of cameras is limited to the what is necessary. Such positioning will also avoid any misuse of surveillance for a totally different and unexpected purposes. The CCTV cameras' field of view is limited to the only area that must be necessarily monitored for the purposes of the processing and does not include areas that are reserved for employees' private use. For example, private spaces of the employees, such as toilets, are not monitored. No cameras monitor an area where people may expect greater respect for their privacy. Further, each person entering the Facility will be given a notice about the ongoing Camera Surveillance including the contact information of the person responsible of the processing to enable persons interested to obtain additional information.
- b. **Informing employees:** Employees are and will be informed about Camera Surveillance and its installation purposes. Given information thus consists of a detailed description of the purposes of the processing, the modalities of the monitoring system and the period for which the data will be stored, and declaration by Waste4ME B.V. that it will not use the personal data for any other purposes than those explicitly mentioned. The employees will also be informed about their right to lodge a complaint under Article 77 of the GDPR.
- c. **Period of storage:** Period of storage is 4 weeks. If there were no incidents during this period, Surveillance Information will be erased. However, if CCTV has recorded a particular incident, Waste4ME B.V. may retain the recording long enough for the incident to be investigated.
- d. **Access to the stored data:** Only authorized Waste4ME B.V. staff will have access to the real time images and to the stored data. All authorized staff of Waste4ME B.V. sign a statement of confidentiality concerning the use of Camera Surveillance. Further, all staff holding access to the Surveillance Information, receives training on data protection, and new members will have the same training when they join the company. Remote access is possible in certain cases (for example, to react and intervene immediately in incidents or in the need of online support for WER Unit) through secured connection.
- e. **Disclosure of personal data<sup>2</sup>:** The transmission of Surveillance Information to third parties for the purpose other than that for which the data has been collected is possible under the rules of Article 6 (4). For example, a camera recording WER Unit is installed for protecting the WER unit. When a damage occurs and the recording is transferred to a lawyer to pursue a case, the purpose for recording is the same as the one for transferring. Also, when Dutch legislation requires Waste4ME B.V. to cooperate with law enforcement (e. g. investigation), Waste4ME B.V. discloses the data in accordance with the conditions foreseen by law. In this case, the legal basis for handing over the data is legal obligation under Article 6 (1) (c).
- f. **Linked databases or systems:** Surveillance Information is stored on a local system and will be backed up on the cloud environment. This data is stored in the Netherlands. Regardless of the storage destination, the recordings are retained only for 4 weeks unless a particular

---

<sup>2</sup> Third party recipient has to make its own legal analysis (i.e. identify its legal basis under Article 6 of the GDPR for its processing).

incident is recorded so that the data may be retained long enough for the incident to be investigated.

g. **Technical and organizational safeguards favouring privacy:**

- The viewpoints of the camera have been chosen to cover only the areas to be monitored for the stated purposes. Waste4ME B.V. uses Camera Surveillance only to target specifically identified security problems thus minimizing the collection of irrelevant information. Such minimization of data also helps to improve the data quality and more efficient use of Camera Surveillance.
- All activity on the access system is recorded (recording of the activity and the relevant active user). Monitoring and detection of access failures is done continuously and identified weaknesses are addressed as soon as possible. Regular checks are implemented to ensure that the CCTV system is working properly, thus for ensuring confidentiality, integrity and availability of the Camera Surveillance system.
- Means are implemented to restore availability and access to the system in the event of a physical or technical incident.
- Access control ensures that only authorized people can access the layer of the system and data they are authorized to access, while others are prevented from doing it. Surveillance Information is available only through a specific VPN and with a login code and password. Physical records are kept within safe physical structures and only Waste4ME B.V.'s authorized staff has the proper keys. Also, internal procedures for granting, changing and revoking physical and logical access are defined and enforced.
- Ensuring confidentiality of the Surveillance Information is a part of Waste4ME B.V.'s staff's contractual obligations.
- Technical measures are implemented in the CCTV system to minimize personal data collection and to avoid intrusion of the areas where the employees expect greater privacy (for example, the windows of the cabin are masked through the CCTV system to avoid collection of any data on the inside of the cabin).

## VII. Rights of the Data Subjects (identifiable people who appears in the video footage)

- a. Persons filmed have the right of access to personal data concerning them and to have those **data rectified** if they are inaccurate or incomplete.
- b. As regards exercise of **the right of access**, Waste4ME B.V. explains which personal data it has processed or are still processing of the data subject. Waste4ME B.V. also explains the purposes for which the data have been or are being processed, with whom the data will be shared, how long it is expected to be stored, and what other rights the data subjects can enforce. it is possible to arrange a viewing of the images or to provide the requesting person with a copy of the images recorded. In that case, the requesting party must show identification to Waste4ME B.V. before viewing the images. S/he must also state the date, time, location and circumstances in which s/he was recorded. Requesting parties may view the images free of charge and, if the data subject can show a legitimate interest, obtain a copy of them also free of charge. This copy will be in compliance with Article 20 of the GDPR on the right to data portability.
  - Given the properties of the Facility, number of data subjects may be recorded in the same sequence of video surveillance. This results in processing of personal data of different data subjects. If a data subject wishes to receive a copy of the material (Article 15 (3)), this copy may involve and could adversely affect the rights and

- freedoms of other data subjects. Pursuant to Article 15 (4) GDPR, Waste4ME B.V. may refuse to hand out information, while giving proper explanation, upon such request when the request may adversely affect the rights of others. Waste4ME B.V. will implement to its best ability technical measures to fulfil the access request by implementing the proper image-editing such as masking.
- Waste4ME B.V. may not be able to identify the data subject due to the fact that Surveillance Information is not searchable for personal data (such as face image) and Waste4ME B.V. would likely have to go through a large amount of stored material in order to find the data subject in question) and it may not be able to identify the data subject (Article 11 (2) GDPR). For these reasons the data subject should her/his request specify to Waste4ME B.V. at the time of her/his request when she or he entered the monitored area. If Waste4ME B.V. is not in a position to identify the data subject, it will inform the data subject accordingly, if possible.
  - In case that the request of the data subject is excessive or manifestly unfounded, Waste4ME B.V. may either charge a reasonable fee in accordance with Article 12 (5) (a) GDPR, or refuse to act on the request (Article 12 (5) (b) GDPR).
- c. The data subject may request for the personal data to be **erased** under Article 17 GDPR. Waste4ME B.V. erases the personal data without undue delay when one of the circumstances listed under Article 17 (1) of the GDPR applies (and none of the exceptions listed under Article 17 (3) GDPR does). This means that a data subject can request the erasure of personal data in Waste4ME B.V.'s systems in one or more of the following cases:
- the personal data is no longer needed for the purposes for which we have processed it;
  - you withdraw your permission for (further) processing; and there is no other basis for processing;
  - you make a substantiated objection, and there are no compelling reasons not to honor your objection;
  - the personal data has been processed unlawfully by us;
  - we must delete your personal data on the basis of a legal obligation;
  - we have collected your data through mobile telephony or internet services.
- Waste4ME B.V can refuse to erase the personal data:
- for compliance with a legal obligation which requires processing by law to which the Waste4ME has to comply;
  - for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3) of the GDPR;
  - for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of the GDPR in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
  - for the establishment, exercise or defense of legal claims.
- d. For Camera Surveillance based on Article 6 (1) (f) GDPR, the data subject has **the right to object**, to stop the processing of her/his data on grounds relating to his/her particular situation, to the processing in accordance with Article 21 GDPR. Waste4ME B.V. has one month to respond to such requests from the data subject, however this period can be extended by two further months if the requests are complex and many. In the context of video surveillance this objection should be made either prior to entering, during the time in, or after leaving, the area under surveillance.
- Waste4ME B.V. can continue processing by showing the compelling legitimate grounds that overrides the rights and interests of the data subject.

## VIII. Review

**Internal Audit:** An internal audit shall be carried out every 2 years to analyse:

- if there is a need of video surveillance system,
- the suitability of the system to meet the objectives set;
- the lack of other adequate alternatives.

## IX. Data Breach

In the case of a personal data breach, Waste4ME B.V. will act in accordance with Article 33 and 34 of the GDPR.

## X. Compliance Status

Waste4ME B.V. handles the Surveillance Information in compliance with national law, GDPR and the applicable guidelines on implementation of CCTV.

## XI. Contact

Waste4ME B.V. takes the protection of personal data seriously. Questions regarding this policy or specific personal data can be send by e-mail or post to the address below. To ensure that the personal data is not forwarded to third parties, Waste4ME B.V. kindly asks you to include your personal information within such request (such data will also be erased after your request is finalized):

**Waste4ME B.V.**  
Sisalbaan 13, Office 1.07  
2352 ZA Leiderdorp, The Netherlands  
Email: [info@waste4me.com](mailto:info@waste4me.com)

If you want to make use of one or more of data subject rights listed above, you can also contact Waste4ME B.V. via the contact details above. Waste4ME B.V. will decide on the request within 4 weeks, unless Waste4ME B.V. informs you within that period that Waste4ME B.V. needs a little more time.

## XII. Complaints

For complaints about the use of personal data, the complaints procedure of the Dutch Data Protection Authority can be checked. This authority is authorized to take note of your complaint.

## XIII.Changes to our privacy policy

This policy on CCTV system is in accordance with the GDPR. Waste4ME B.V. reserves the right to update this policy. The latest version is published on this page.

*Published: Jan 2020*