

## Beyond Gravity Video Recording (CCTV) Privacy Notice

Data protection is a matter of trust, and your trust is a core value of the Beyond Gravity. This privacy notice („**Privacy Notice**“) is based on the EU General Data Protection Regulation („**GDPR**“) – even where the GDPR does not apply – to ensure a high level of protection for all individuals whose personal data is processed by all legal entities of the Beyond Gravity in the frame of video recording process (or CCTV<sup>1</sup>), which may take place at Beyond Gravity's premises for security and surveillance purposes.

This Privacy Notice describes the processing of personal data by all legal entities of Beyond Gravity, unless specified otherwise, such as additional privacy notices or in a contract.

### 1. Who we are?

Beyond Gravity (including Beyond Gravity companies and legal entities controlled by Beyond Gravity) is responsible for the processing of personal data according to this Privacy Notice (also referred hereinafter to as “**we**” and/or “**us**”). Each Beyond Gravity company that processes personal data for its own business purposes acts as a data controller. For example, if you interact with a company about a matter concerning that company, it will be the controller of the personal data processed in parity with your request.

Therefore, for the purposes of video recording, the company indicated on the local video recording signage is responsible for video recordings within Beyond Gravity. A local video recording Privacy Notice, applicable to each respective Beyond Gravity company, may apply. These are made available at Beyond Gravity website at [www.beyondgravity.com/en/privacy](http://www.beyondgravity.com/en/privacy).

A list of the Beyond Gravity companies and their contact details is available at <https://www.beyondgravity.com/en/imprint>.

For further information please refer to our general Beyond Gravity Privacy Notice available at [www.beyondgravity.com/en/privacy](http://www.beyondgravity.com/en/privacy).

If you have any questions or requests in relation to the processing of your personal data, you can contact our Data Protection Team at [data.protection@beyondgravity.com](mailto:data.protection@beyondgravity.com).

### 2. Which personal data do we process and for what purposes?

“**Personal data**” is the information relating to yourself (or from which you may be identified). The scope of this Privacy Notice covers all employees of Beyond Gravity (“**Employees**”), as well as other individuals (such as contractors, suppliers, visitors, business partners or other third parties) performing activities at Beyond Gravity’ premises as well as entering or intending to enter Beyond Gravity’ premises. The video surveillance is intended to protect employees and third parties as well as Beyond Gravity’ operations and infrastructures.

We may process your personal data in the following situations and for the following purposes:

- **Physical security** and protection of Beyond Gravity's sites and facilities, Beyond Gravity's property, assets valuable objects, products, information, and technology as well as checking the actions and omissions committed against the property, or in case of a reasonable suspicion,

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<sup>1</sup> CCTV is a closed-circuit television, or a TV system in which signals are not publicly distributed and are monitored for surveillance and security purposes,

- **Protection of human life**, health, and personal freedom, as well as for purposes of occupational health and safety, prevention and investigation of workplace accidents, prosecution for violating occupational health and safety rules, deterrence and/or documentation of acts of aggression or harassment against employees and other individuals,
- **Safeguarding dangerous substances** as well as preventing extraordinary events, which may potentially happen in this context, avoiding their consequences, detecting violations as well as assisting in their investigation and prosecution,
- **Protection of assets** owned / possessed by employees or other stakeholders, prevention and investigation of complaints due to related violations.
- **Prevention of possible illegal acts** as well as recording **evidences**, possibly needed during official proceedings related to such illegal acts.

Additionally, and where applicable, respective onsite **video recording signage** indicates the purpose, the legal basis, the storage duration for such recording and, if applicable, the categories of personal data recipient(s).

Personal data, processed for this purpose, may be faces, appearance and semblance of Beyond Gravity' employees and other individuals, as well as images obtained from the video recording. Biometric data will not be processed and the matching of individuals using Machine Learning (ML) is not being performed.

Video recordings (CCTV) are used only for legal and lawful purposes, defined in Sec. 2 of this Privacy Notice, while respecting human dignity. The purpose of data processing is not to monitor or influence the behavior and habits of Beyond Gravity' employees or other individuals subject to data processing. Therefore, placement of the cameras and the adjustment of their viewing angles have been determined in a way, that the viewing angles are directed only to the area consistent with the purpose of data processing, or certain areas are covered by masking techniques, and only the extent necessary for the purpose is monitored.

The use of the video recordings is only possible for the purpose of identifying or checking events (e.g., illegal acts, workplace accidents etc. or a reasonable suspicion of such), in accordance with the purposes set in Sec. 2 of this Privacy Notice as well as for asserting related claims. Video recordings are being checked by authorized Beyond Gravity' personnel. Video recordings might also be checked for the purpose of investigation of a suspicion of a crime, actual injury or damage to people or property or other illegal acts.

As a rule, the cameras are working continuously. It is forbidden to turn off cameras, cover them, obstruct or to otherwise prevent video recording without instruction from authorized Beyond Gravity' personnel.

### 3. On what legal bases do we process your data?

We process your data based on the following legal bases:

- legitimate interests of our company (article 6 para. 1 let. f GDPR) in ensuring physical security of our premises, buildings, assets, materials, and persons during its activities, and in detecting and preventing illegal events,
- for compliance with a legal and regulatory obligation (article 6 para. 1 let. c GDPR),
- in order to protect the vital interests of the data subject or of another natural person (article 6 para. 1 let. d GDPR).

If you provide us with **special categories of personal data** (e.g., sensitive personal data), we will process these on the basis of your consent (article 9 para. 2 let. a GDPR). In addition, we may also use your personal data in anonymous form for statistical purposes.

We do not intend to use your personal data for purposes other than those listed above. Otherwise, your prior consent will be obtained.

You are generally under no obligation to disclose personal data to us. However, we must collect and process certain data to be able to conclude and perform a contract, and for compliance and security purposes.

#### **4. Who do we share your personal data with?**

Third parties (such as service providers) may not access the video recordings without an authorization of respective Beyond Gravity entity and under Beyond Gravity's supervision (e.g., in course of maintenance of the camera systems). Respective contractual obligations are set with the local providers of the CCTV infrastructure.

The personal data processed during the video recording may be disclosed to the following recipients that may be located abroad:

- other Beyond Gravity companies and Beyond Gravity's authorized personnel,
- Security and IT service providers authorized by Beyond Gravity,
- authorities, including law enforcement agencies, based on the provisions of the law, in compliance with our legal obligations and/or if it is necessary to enforce the rights of Beyond Gravity, our employees or other parties. Recordings may also be forwarded or made available upon court or official request.

In this case, your personal data may also be shared abroad to the recipients outside of Switzerland, the EU or the EEA. In all cases, the responsibility for data processing remains with Beyond Gravity. If we disclose your personal data to a recipient in such a country, we typically enter into the European Commission's standard contractual clauses (available [here](#)) in order to ensure the data protection level and safeguards required by the applicable law. For the details, please refer to our general Beyond Gravity Privacy Notice available at [www.beyondgravity.com/en/privacy](http://www.beyondgravity.com/en/privacy).

#### **5. How long do we retain your personal data?**

Video recordings will be stored for a limited period of time, as long as it is necessary and authorised by the national legislation and will be deleted afterwards. Video recordings will only be evaluated if required and within the limits of the purpose for which they were made.

#### **6. How do we protect your personal data?**

We take appropriate technical and organisational security measures to maintain the required security of your personal data and to protect it against unauthorised or unlawful processing and to prevent the risk of loss, unintentional alteration, unintentional disclosure or unauthorised access. Obtained video recordings are stored securely in special servers with limited access.

#### **7. What are your rights in respect to your personal data?**

You have certain rights under applicable data protection laws, in particular the following rights, in each case as set forth and within the limits of applicable law:

- **Right of access:** You are entitled to a copy of the personal information we hold about yourself and certain details on how we use it. Your personal data will usually be provided to yourself in writing, unless otherwise requested, or where you have made the request by electronic means, in which case the information will be provided to you by electronic means where possible. If you make a subject access request and there is any question about who you are, we may require you to provide information from which we can satisfy ourselves as to your identity.
- **Right to rectification:** We take reasonable steps to ensure that the information we hold about yourself is accurate and complete. However, if you do not believe this is the case, you can ask Beyond Gravity to update or amend it.
- **Right to erasure:** In certain circumstances, you have the right to ask Beyond Gravity to erase your personal information, for example where the personal information we collected is no longer necessary for the original purpose or where you withdraw your consent. However, this will need to be balanced against other factors (e.g., we may have legal and regulatory obligations, which means we cannot comply with your request).
- **Right to restriction of processing:** In certain circumstances, you are entitled to ask us to stop using your personal information, for example where you think that the personal information, we hold about yourself, may be inaccurate or where you think that we no longer need to use your personal information.
- **Right to data portability:** In certain circumstances, you have the right to ask that we transfer personal information that you have provided to us to another third party of your choice.
- **Right to object:** You have the right to object to processing, which is based on our legitimate interests, which is the case here. Unless we do have a compelling legitimate ground for the processing, we will no longer process the personal data on that basis when you file an objection. Note however, that we may not be able to provide certain services if we are unable to process the necessary personal data for that purpose.
- **Rights relating to automated decision-making:** You have the right not to be subjected to automated decision-making, including profiling, which produces legal effect for yourself or has a similar significant effect. We generally do not use automated decision-making or profiling in the employment context, but if you have been subject to an automated decision and do not agree with the outcome, you can contact the Beyond Gravity Data Protection Team ([data.protection@beyondgravity.com](mailto:data.protection@beyondgravity.com)) below and ask us to review the decision.
- **Right to withdraw consent:** In most cases, we do not base the processing of your personal data on your consent. However, it may happen that we ask for your consent in specific cases. In case we do this, you have the right to withdraw your consent to further use of your personal information. To withdraw your consent, please contact the Beyond Gravity Data Protection Team. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. In addition, if you withdraw consent, it will not affect the lawfulness of what we have done before such withdrawal.
- **Right to lodge a complaint:** You have the right to lodge a complaint with a supervisory authority. The supervisory authority of your country of residence will generally be competent for a complaint and will also provide advice or direct you to another supervisory authority.

To exercise these rights, please contact our Beyond Gravity Data Protection Team at ([data.protection@beyondgravity.com](mailto:data.protection@beyondgravity.com)).

Please note that these rights are subject to certain conditions and may be subject to exceptions.

## 8. Contact details

If you have any questions or would like to exercise your rights in relation to the processing of your personal data, please contact the Beyond Gravity' Data Protection Team ([data.protection@beyondgravity.com](mailto:data.protection@beyondgravity.com)).

Physical requests may be sent to:

Beyond Gravity Services AG  
Global Data Protection Officer  
Bahnhofplatz 10b  
3011 Bern  
Switzerland

or to each respective Beyond Gravity company in its role as Data Controller. List of Beyond Gravity companies and their contact details is available at <https://www.beyondgravity.com/en/imprint>.

## 9. Changes to this Privacy Notice

This privacy notice may be changed by us unilaterally from time to time, in particular, if we change our data processing or in case of new legislation. Please refer often to this page for the latest information and the effective date of any changes. The version published on this website is the current version. Changes to the Notice shall not apply retroactively.