



PIEROŃCZYK

**SUBCONTRACTING
PRECISION PRODUCTS**

KOLEJNICTWO · PRZEMYSŁ · MOTORYZACJA

Ślusarstwo Produkcyjne

inż. Andrzej Pierończyk

ul. Budowlana 5, 41-100 Siemianowice Śląskie

NIP 6430003808 · REGON 270579373 · BDO 000245386

ING Bank Śląski PLN: 25 1050 1214 1000 0007 0041 2505

ING Bank Śląski EUR: PL68 1050 1214 1000 0090 7094 9616 · SWIFT/BIC: INGBPLPW

CCTV MONITORING POLICY

SUBCONTRACTING PRECISION PRODUCTS

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CHAPTER I. GENERAL PROVISIONS

§ 1

This Policy sets out the rules for the use of video surveillance (CCTV) at Ślusarstwo Produkcyjne inż. Andrzej Pierończyk, ul. Budowlana 5, 41-100 Siemianowice Śląskie, hereinafter "Employer" or "Controller".

Video surveillance is used solely to the extent necessary to achieve the purposes stated in this Policy, with respect for the dignity, privacy and other personal rights of employees, associates, visitors, contractors and other persons present on the company's premises.

This Policy is an internal organisational document defining the purposes, scope, manner of use, access rules, retention period for recordings and the information obligations associated with CCTV monitoring.

§ 2

The legal basis for video surveillance is in particular: Art. 22² of the Polish Labour Code, Regulation (EU) 2016/679 of the European Parliament and of the Council ("GDPR"), the Polish Act of 10 May 2018 on the protection of personal data, and other applicable laws.

In matters not regulated by this Policy, the applicable laws, internal personal data protection rules, information security rules and other organisational documents in force at the Employer shall apply.

CHAPTER II. PURPOSES OF MONITORING

§ 3

Video surveillance may be used in particular to:

- ensure the safety of employees, associates, visitors, contractors and other persons present on the premises;
- protect the property of the Employer, employees, customers, consigned materials, technical equipment, machines, tools, vehicles and documentation;

- control production and ensure the correct course of processes in manufacturing, logistics and storage areas, to the extent necessary to protect safety, quality and continuity of operations;
- maintain the confidentiality of information whose disclosure could cause harm to the Employer, customers or business partners, including technical, organisational, commercial, quality and production information;
- investigate incidents that breach safety, order, property protection, H&S; rules, information protection rules or other rules applicable on the premises.

CHAPTER III. SCOPE AND LOCATION OF MONITORING

§ 4

Video surveillance covers selected areas of the premises in which the company operates. Camera locations, angles of view and technical parameters are defined in internal technical documentation. The full technical specification is not published publicly and is available only to authorised persons, the system maintenance service, auditors and authorities empowered by law.

Monitored areas may include in particular: production halls, warehouses, loading and unloading areas, car parks, access roads, entrance areas, corridors and other common areas of the premises. Monitoring does not cover toilets, changing rooms or other areas designated for personal hygiene.

§ 5

SPP does not monitor work e-mail, employee computer activity or vehicle location (GPS). The introduction of any of these forms of monitoring would require a prior legal basis, updating of documentation and informing employees in accordance with Art. 22³ of the Labour Code.

CHAPTER IV. PERSONAL DATA PROCESSING

§ 6

The Controller of personal data recorded by the CCTV system is Ślusarstwo Produkcyjne inż. Andrzej Pierończyk, ul. Budowlana 5, 41-100 Siemianowice Śląskie, NIP 6430003808, e-mail: biuro@pieronczyk.pl.

Recordings are processed on the legal basis of the Controller's legitimate interest (Art. 6(1)(f) GDPR) — ensuring the security of the premises, persons and property, as well as protecting against unlawful conduct. For employees, Art. 22² of the Polish Labour Code also constitutes a legal basis.

§ 7 — Retention period

Recordings are stored for no longer than 14 days from the date of recording, unless their longer retention is required by applicable law, by an investigation of an incident, or at the request of a law enforcement authority. After the retention period has expired, recordings are automatically overwritten or deleted.

§ 8 — Access to recordings

Access to recordings is restricted to authorised persons: the owner, authorised employees, system maintenance providers, and law enforcement authorities in cases provided for by law.

Recordings are not disclosed to third parties without a legal basis. Requests from external entities are handled in accordance with applicable law.

CHAPTER V. RIGHTS OF DATA SUBJECTS

§ 9

Each person captured by the CCTV system has the right to:

- request information about the processing of their personal data;
- request access to recordings where technically feasible, provided this does not infringe the rights of other persons;
- request restriction of processing or object to processing on grounds relating to their specific situation;
- lodge a complaint with the supervisory authority (President of the Personal Data Protection Office — UODO) if they believe their personal data are being processed unlawfully.

Requests should be submitted in writing to: biuro@pieronczyk.pl or by post to the Controller's address.

CHAPTER VI. INFORMATION OBLIGATIONS

§ 10

The Controller fulfils information obligations through:

- placing clearly visible signs at the entrances to monitored areas indicating the use of video surveillance;
- making available a general GDPR information notice in a location accessible to interested parties;
- including the necessary information in the privacy policy and on the company's website.

Employees are informed of the use of CCTV monitoring before commencing work, and any changes to the scope of monitoring are communicated no later than 2 weeks before the changes take effect.

CHAPTER VII. FINAL PROVISIONS

§ 11

This Policy comes into force on 2026-07-01 and shall be reviewed at least once a year and whenever circumstances arise that require amendment. The Controller is responsible for ensuring the security of the CCTV system, including protection against unauthorised access, modification or deletion of recordings.

Prepared by: Damian Pierończyk Date: 2026-07-01
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Approved: Andrzej Pierończyk Date: 2026-07-01
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