Rules for video and audio monitoring

2024

Table of Contents

1. Introduction

The procedure for conducting hereof video and audio monitoring (hereinafter referred to as the "Procedure") defines the procedure for conducting video monitoring of the branches by JSC Microfinance Organization Georgian Capital (hereinafter referred to as the "Company"), the procedure for conducting video monitoring in the internal and outer space of the branches, the period and procedure for the storage of video recording, the rules for access to and destruction of video recording, and information on the mechanisms for protecting the rights of the data subject. In addition, this procedure regulates the procedure for audio monitoring, the period of storage and procedure for audio recording, and the procedure for accessing and destroying audio recording.

2. Definition of Terms

For the purposes of the hereby document, the terms below have the following meanings:

Personal data (hereinafter referred to as the "data") – any information related to an identified or identifiable natural person. A natural person is identifiable when it is possible to identify him/her directly or indirectly, including by name, surname, identification number, geolocation data, electronic communication identification data, physical, physiological, mental, psychological, genetic, economic, cultural or social characteristics.

Data processing – any action performed in respect of data, including video monitoring, audio monitoring, organizing, grouping, interconnecting, storage, replacement, recovery, requesting, use, blocking, deleting or destroying, as well as disclosure of data by transmitting, disclosing them, publication or otherwise making them available.

Data subject – any natural person whose data is processed.

Video monitoring – the processing of visual image data using the technical means deployed/installed by the company in the inner branch area or on the outer perimeter of the branch, in particular, video control and/or video recording.

Video monitoring system - a set of technical means used for visual monitoring of space.

Audio monitoring - the processing of voice signal data using the technical means deployed/installed by the company, in particular, audio control and/or audio recording.

Person/company responsible for processing - JSC "Microfinance Organization Georgian Capital" - a company that individually determines

the goals and means of personal data processing and directly processes the data.

Workplace - a private space of the company, where the employees of the institution directly exercise official powers (for example, workroom, conference/meeting room, cash register).

Authorized person - a person defined under an internal act by the director of the company, who is eligible to access video recordings and/or audio recordings and has his/her own account to enter the system and gain access to video recording/audio recording.

Incident – a data security breach that causes unlawful or accidental damage, or loss, as well as unauthorized disclosure, destruction, alteration, access, collection/extraction or otherwise unauthorized processing.

3. Rules for video monitoring

3.1. Purpose and basis of video monitoring

The outer perimeter of the building, and the inner perimeter of the branch, including the accounting room, are subject to video monitoring. In detail, the number of video cameras, their location and placement spots are determined under Annex N1 to this procedure.

Video monitoring is carried out to achieve the following goals:

- Protecting the safety and property of a person.
- Protection of classified information.

Inasmuch as the company is a microfinance organization that carries out activities defined by law and in the area covered by video monitoring scopes, there is a threat posed to the safety of the employees and the encroachment on the ownership (assets) of the company, as well as the need to protect classified information, the company ensures uninterrupted video monitoring in accordance with this procedure.

3.2. Video Monitoring scopes

The Company ensures video monitoring only to the extent necessary for the achievement of the objectives as defined by the Law of Georgia on Personal Data Protection and paragraph 3.1 of the hereby procedure.

The company monitors only the area where there is a threat to the safety and property protection of a person, as well as the need to protect classified information and is not carried out and should not be supervised in the area where there is no such need.

According to the company's assessment, it is impossible to achieve the aforementioned goal by means other than video monitoring, and video monitoring constitutes an effective and proportionate means to achieve the goal.

3.3. Duration of video monitoring and period of storage of video recording

Video monitoring is carried out 24/7.

The company saves video recording for a period of 40 (forty) days, after which the video recording is destroyed in accordance with the procedure specified in paragraph 3.5.

The necessity to store a video recording for a period of 40 (forty) days and at the same time, the obligation stems from Decree No 58/04 of April 05, 2018, of the President of the National Bank of Georgia and Ordinance N101 of March 02, 2022, of the Government of Georgia "on the approval of the technical characteristics of automatic photo and video equipment and the procedure for their operation, as well as on the approval of the list of buildings on the outer perimeter, where the automatic photo and/or video equipment shall be mandatorily placed/installed".

3.4. Rules for storing of and access to a video recording

Persons/authorized persons enjoying access to video monitoring systems (DVR equipment, monitors, etc.) and video recordings and those carrying out appropriate actions shall be determined by an internal act of the Director. It shall be inadmissible to grant access to the system to a person who is not determined by this act.

The company ensures the physical security of the video monitoring system, namely, the video monitoring system, and its technical equipment (DVR device, monitors, etc.) are placed in a safe room (server room), where only persons with relevant powers will be admitted.

Video recordings are stored by the company on a secure server, where access is carried out only by the authorized person by entering the username and password in the account.

The company provides access to real-time video monitoring and video images on the monitor only to authorized persons.

Access to video recording cannot be ensured from external devices and an entity holding access is obliged to enter only from the internal system of the company.

To protect against viruses, the company uses an antivirus system and other protection technologies to prevent illegal penetration from the Internet and the computer network.

In case of detection of a technical fault in the recording system, the authorized person is obliged to immediately notify the IT department of the company in order to address the deficiency in a timely manner.

An authorized person responsible for the video recording monitoring shall be obliged to regularly inspect:

- whether uninterrupted video monitoring is underway;
- The date/time indicated on the video camera corresponds to real time;

- Whether there are the last 40 (forty) day video recordings for all cameras;
- Whether the interruption is detected and if such, to immediately upload a notification on the Special website of the Ministry of Internal Affairs (http://camera.mia.gov.ge) with reference to the date of termination and the interval of the intermittent time. The cause of the interruption should also be indicated (e.g., the suspension of power, recorder technical damage, etc.).

If there is a suspicion that the system is damaged/there is a fact of the penetration of third parties into the system or otherwise the likelihood of illegal encroachment on personal data, the authorized person shall respond to this fact in accordance with the procedure determined by the Incident Response Policy.

3.5. Rules for video recording destruction

As soon as the video recording storage term expires, the video recording is deleted automatically. Restoring the deleted record or otherwise gaining access thereto after its deletion is technically impossible.

4. Mechanisms for protecting the rights of the data subject

4.1. Video Monitoring Warning

The company has posted a video monitoring sign in the area covered by video monitoring. It is necessary to place a video monitoring sign in all the areas from which video monitoring is carried out and the corresponding video camera is installed.

The video monitoring warning sign is placed in the Georgian language and contains the information as follows:

- Warning about video monitoring;
- Information that video monitoring is carried out by JSC "Microfinance Organization Georgian Capital";
- Contact details of JSC "Microfinance Organization Georgian Capital".

At that, according to the Law of Georgia on Personal Data Protection, the company is obliged to place the aforementioned warning sign on the video monitoring as of March 01, 2024, and the obligation to place the identity and contact details of the person shall not apply to the signs posted before the said date. Accordingly, the Company will place its identity and contact details only on the video monitoring warning sign that will be posted as of

March 01, 2024, and the signs posted before this date will remain unchanged.

4.2. Video monitoring of the workplace

The company ensures video monitoring of the workplace only to the extent necessary to achieve the purpose determined by this procedure.

The company does not monitor the area that is not necessary to achieve the abovementioned goal, as well as where the employee carries out non-official activities.

The company does not exercise video control in view of the control of the performance of employee work and compliance with internal regulations.

Protection of personal data and privacy rights are guaranteed by the Company. Accordingly, during video monitoring at the workplace, the company ensures compliance with the rules established by the legislation and the right to privacy of employees.

The company provides information on the procedure for conducting video monitoring to the employees in writing, namely, with the introduction of Appendix N2 to employees, which is confirmed by their signature.

When any changes to the procedure for video monitoring are made, the company will provide information on the updated rules with notices sent to employees via e-mail.

4.3. Rights of the data subject

The data subject shall be authorized to perform the following actions in relation to his/her personal data:

- To request a copy of the video recording;
- To request information on the data storage period, and if a specific time limit cannot be determined, on the criteria for determining the timeframe;

- To request information on whether his/her data has been transferred, on the legal basis and purposes of data transfer, as well as appropriate data protection guarantees, if the data is transferred to another state or international organization;

- To request information on the identity of the data recipient or the categories of data recipients, including information on the grounds and purpose of data transfer, if the data is transferred to a third party;

- To request the alignment, updating and/or filling out of false, inaccurate and/or incomplete data.

- If there are reasonable grounds, to request the termination, deletion or destruction of data processing.

- If there are valid grounds, to request data blocking.

- At any time, to re-request information on the person conducting video monitoring, the purpose of video monitoring and legal grounds;

- In case of violation of rights, to address the Personal Data Protection Service or the court.

5. Disclosure of video recordings to third parties

Access to video recordings stored by the company, their browsing, and in some cases, transfer to third parties may become necessary if there is a suspicion that the video recording shows the fact of a crime or other offense, the body conducting the case has an interest in investigating the criminal case and conducting administrative offenses.

In order to ensure public safety, an authorized person of the Emergency Response Center "112" and an authorized person of the Ministry of Internal Affairs of Georgia can use the video surveillance system installed on the outer perimeter, in accordance with the legislation of Georgia.

When disclosing video recordings to an investigative body within the framework of a criminal investigation, the company is obliged to:

- Prior to transferring the video recording, inquire about a court ruling from a representative of the law enforcement agency **and/or a prosecutor's decree** on requesting information. The company may not transfer a recording if a representative of the law enforcement agency fails to submit a similar document to the video monitoring institution;

- Do not allow a representative of a law enforcement agency to view the video recording **without a court ruling and/or a prosecutor's decree**;
- shall be assured that the record of the period specified in the above documents is handed over to a representative of the law enforcement agency and the duration of the recorded video does not exceed the period determined by the ruling/ordinance;
- Do not transfer to a law enforcement body a video recording that is not specified **in the court ruling and/or the prosecutor's** decree; shall be assured that the record of the period indicated in the above documents is handed over to the representative of the law enforcement agency and the duration of the recorded video does not exceed the period determined by the ruling/ordinance;
- Do not allow a representative of a law enforcement agency to look at and scroll records of the period, which is not specified in the court ruling and/or the prosecutor's decree. Also, photographs and/or videos of sections depicting specific images from these recordings may not be taken using a mobile phone or other technical means.

When disclosing records to an administrative (including investigation) body within the scope of administrative offense proceedings, the company shall be obliged to:

- verify that an official written application has been submitted by the administrative body on requesting a video recording with the signature of the authorized person;
- verify that the official written request indicates the legal basis (reason, purpose) for requesting a video recording and information on the need for evidence within the scope of the administrative offense proceedings of the record;
- verify that the official written request indicates the required period of the record.
- Cover the image of third parties that are not necessary to be identified in order to achieve the above goal.

The company is obliged to record the following information in the aforementioned cases:

- Which entry was disclosed (on which date the record was recorded and the record of the period was disclosed).
- For whom the record was disclosed.
- Record disclosure date.
- Legal basis for disclosure of the record.

6. Rules for performing audio motoring

6.1. Purpose and basis of audio monitoring

Phone calls coming and outgoing to the company's hotline are subject to audio monitoring.

Audio monitoring of phone calls entering and passing the hotline is carried out on the following grounds:

- To protect the company's significant legitimate interest, in particular, to identify customers and protect data privacy.

Whereas, the company is a microfinance organization that carries out activities defined by law, serves clients and possesses information about the financial condition of the clients, including on loan products, in order to protect the confidentiality of information, as well as in accordance with Order N14/04 of the President of the National Bank of Georgia "On the Approval of the Code of Ethics related to loan collection by financial organizations", it carries out the hotline uninterrupted audio monitoring of calls according to this procedure.

Before performing an audio recording, the company shall, in a due manner, inform the data subject that his/her conversation is recorded. Also, the company provides customers with information regarding the processing of their personal data.

The server room is also subject to audio monitoring, where video monitors are additionally located.
Audio monitoring in the server room is carried out to protect the company's significant legitimate interest, in particular, for server security purposes.

A proper sign is placed at the entrance to the server room providing that audio monitoring is underway in the server room.

6.2. Duration of audio monitoring and the storage period of the recording

Audio monitoring is carried out continuously on all incoming and outgoing phone calls through the company's hotline.

The company stores the mentioned audio recordings for a period of 2 (two) months, after which the audio recording is destroyed in accordance with the procedure specified in paragraph 6.4 of the hereby procedure.

The audio monitoring recording in the server room is stored for a period of 40 (forty) days, after which the audio recording is destroyed in accordance with the procedure specified in paragraph 6.4 of the hereby procedure.

6.3. Rules for storing audio recording and access to it

Persons/authorized persons who enjoy access to the audio monitoring system and audio recordings and perform appropriate actions shall be determined by an internal act of the Director. It shall be inadmissible to grant access to the system to a person who is not determined by this act.

The company ensures the protection of the audio monitoring system so that audio recordings are protected on the server. Access to it is carried out only by the authorized person entering the username and password in the account.

Access to the audio recording cannot be carried out from external devices and the entity with access is obliged to enter only from the internal system of the company.

To protect against viruses, the company uses an antivirus system and other protection technologies to prevent illegal penetration from the Internet and the computer network.

If a technical fault of the recording system is detected, the authorized person is obliged to immediately notify the IT department of the company to address the deficiency in a timely manner.

An authorized person responsible for monitoring the audio recording process shall be obliged to regularly inspect:

- Whether the defect is fixed and if such, immediately respond in a due manner.

If there is a suspicion that the system is damaged/there is a fact of the penetration of third parties into the system or otherwise the likelihood of illegal encroachment on personal data, the authorized person shall respond to this fact in accordance with the procedure determined by the Incident Response Policy.

6.4. Rules for destroying audio recording

Upon the expiration of the audio recording storage period, the audio recording breaks down automatically. Restoring this entry or otherwise gaining access to it after its deletion is technically impossible.

Annex No 1

On the placement of video cameras in the internal and outer areas of a branch

Ground floor

2 (two) video cameras are located in the outer area of the branch, namely that the camera controls the entrance and outer perimeter of the branch.

3 (three) video cameras are installed in the customer recipient zone on the first floor of the branch.

1 (one) video camera is located in the server room.

1 (one) video camera is located in the archive room.

Second floor

1 (one) video camera that controls the entrance and staircase, as well as the entrance doors of the accounting room.

1 (one) video camera in the accounting room.

Annex No 2

Informing an employee about the progress of video monitoring in the workplace and his/her rights

We would like to inform you that your workroom/space in the branch of JSC "Microfinance Organization Georgian Capital", the city of Tbilisi, 37 Rustaveli Avenue is covered by video monitoring in the 24-hour mode to protect your safety and company's property, as well as in individual cases, confidential information, and the obligation to carry out video monitoring of some workspaces arises from the requirements established by the legislation.

You enjoy the rights provided for by the Law of Georgia on Personal Data Protection. In particular, you are entitled to:

- Request a copy of the video recording;
- Request information about the data storage period, and if a specific time limit cannot be determined, on the criteria for determining the term;
- obtain information on whether your data has been transferred, the legal basis and purposes of data transfer, as well as appropriate data protection guarantees, if the data is transferred to another state or international organization;
- Request information on the identity of the data recipient or the categories of data recipients, including information on the grounds and purpose of data transfer, if the data is transferred to a third party;

- Request the rectification, updating and/or filling of false, inaccurate and/or incomplete data;
- If there are appropriate grounds, request the termination, deletion or destruction of data processing;
- If there are valid grounds, request data blocking;
- At any time, re-request information on the person conducting video monitoring, the purpose of video monitoring and legal grounds;
- In case of violation of your rights, please contact the Personal Data Protection Service or the court.

The above rights may be restricted in the case provided for by Article 21 of the Law of Georgia on Personal Data Protection.

By signing this document, you also confirm that you have read the "Rules for Implementing Video Montage and Audio Monitoring".

Employee's signature:
/Name, Surname/
Date: