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VEHICLE VIDEO MONITORING POLICY

§ 1. Data Controller

The controller of personal data collected in connection with vehicle video surveillance is Axell Transport spółka z ograniczoną odpowiedzialnością, email: rodo.logistics@axell.pl.

For matters relating to personal data protection, please contact us by email at rodo.logistics@axell.pl.

§ 2. Scope and Nature of Video Surveillance

1. The trucks operated by the Data Controller may be equipped with devices recording images of the vehicle's surroundings, including cameras directed towards the areas in front of and alongside the vehicle. Video surveillance may incidentally capture images of individuals, vehicle registration numbers, and other information that may enable the identification of road users.
2. The vehicle may also be equipped with a device that analyses conditions inside the driver's cabin and generates reports or alerts relating to road safety. According to the system's design, the Data Controller does not have access to live footage or recordings from the camera directed towards the driver's cockpit and receives reports only.
3. Video surveillance is not intended for continuous monitoring of drivers or audio recording.

§ 3. Purposes and Legal Bases for Processing

1. Video surveillance is used to the extent necessary to improve the safety of drivers and other road users, protect vehicles and transported goods, document road traffic incidents, and establish, pursue, and defend legal claims.
2. The legal basis for processing the personal data of third parties is Article 6(1)(f) of the GDPR – the legitimate interests pursued by the Data Controller or a third party (the vehicle driver). With regard to employees, the relevant provisions of labour law, including Article 22^2 of the Polish Labour Code, also apply insofar as they are applicable to the specific form of monitoring.

§ 4. Principles of Data Processing

1. Personal data is processed in accordance with the principles of lawfulness, fairness, transparency, data minimisation, purpose limitation, storage limitation, integrity, and confidentiality, as set out in Article 5 of the GDPR. Cameras must be positioned in such a way that the scope of surveillance does not extend beyond what is necessary to achieve the specified purposes.
2. The Data Controller restricts access to personal data to duly authorised persons and implements appropriate technical and organisational security measures in accordance with Articles 24, 25, and 32 of the GDPR, aimed at minimising the risks associated with personal data breaches.

§ 5. Data Retention

1. Data collected through vehicle video surveillance is stored on infrastructure located in Europe, in accordance with the arrangements made with the system provider. The location of the server does not, in itself, exclude transfers of personal data outside the European Economic Area (EEA), for example, through remote access by the system provider's subcontractors.
2. The standard retention period for video recordings by the Data Controller does not exceed 3 months, while reports are retained for no longer than 5 years. These retention periods are determined by the Data Controller through the system configuration, taking into account Article 5(1)(e) of the GDPR and the provisions of the Polish Personal Data Protection Act of 10 May 2018. Materials preserved in connection with an incident or legal claim may be retained for a longer period, for as long as necessary to fulfil the specific purpose of personal data processing.

§ 6. Recipients of Personal Data

Recipients of personal data may include authorised employees of the Data Controller, the system provider acting under a data processing agreement in accordance with Article 28 of the GDPR, entities providing legal and insurance services, and competent authorities where there is a legal basis for such disclosure. Personal data is not made publicly available.

§ 7. Rights of Data Subjects

Data subjects have the following rights, subject to the conditions set out in the GDPR: the right of access to personal data (Article 15 GDPR), the right to rectification (Article 16 GDPR), the right to erasure (Article 17 GDPR), the right to restriction of processing, unless such restriction is not permitted under applicable law (Article 18 GDPR), and the right to object to processing based on Article 6(1)(f) GDPR (Article 21 GDPR).
The exercise of these rights may be subject to limitations arising from the rights of other individuals or applicable legal provisions.
Data subjects also have the right to lodge a complaint with the President of the Polish Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych) pursuant to Article 77 of the GDPR.

§ 8 Information on Vehicle Video Surveillance

Information regarding the use of video surveillance in vehicles operated by the Data Controller is publicly available on the Data Controller's website at axell-group.com.
Additionally, vehicles equipped with video surveillance systems may be marked with signs indicating the use of video recording devices.
This information is intended in particular for road users, pedestrians, and other individuals within the field of view of cameras installed in the Data Controller's vehicles, whose personal data, including their images or vehicle registration numbers, may be captured in video recordings.



§ 9 Automated Decision-Making and Profiling

Personal data collected through vehicle video monitoring is not used to make decisions concerning data subjects based solely on automated processing, including profiling, as referred to in Article 22 of the GDPR.