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|  | KOZLODUY NPP EAD |

# PROCEDURE FOR PHOTO TAKING AND VIDEO RECORDING BY EXTERNAL INDIVIDUALS IN SECURITY-RELATED AREAS AT KOZLODUY NPP

This document stipulates the procedure for photo taking and video recording in security-related areas at Kozloduy NPP by external individuals and procedure for provision of photographed and video recorded materials to protect the personal data and trade secret. The document is prepared in compliance with the approved Procedure on Photo Taking and Video Recording in Security-Related Areas at Kozloduy NPP, 10.ФЗ.00.ПЦ.039.

The requirements apply to all photos and video materials taken in the security-related areas at Kozloduy NPP.

## 1. Regulatory requirements for photo taking and video recording.

Photo taking and video recording of all individuals at Kozloduy NPP site, which would enable their personal identification, requires fulfilment of all legal requirements of the Republic of Bulgaria and the EU legislation, which includes the following:

At Kozloduy NPP site, which is a strategic site important for the national security (Decree No. 181 of the Council of Ministers of 20 July 2009,) photos and videos are taken in the restricted access area which does not require consent from the individuals pursuant to Article 6, para. 1, point “f” of Regulation (ЕС) 2016/679 /Legitimate Interest Pursued by the Controller/. These actions shall be carried out for all purposes which are not contrary to the legislation of the Republic of Bulgaria and the EU legislation.

Photo taking and video recording with equipment which does not allow personal identification of individuals (radiographic control, laser measurement, etc.) does not require permit under this Procedure.

## 2. Obtaining permit for photo taking and video recording by external individuals

* 1. When external individuals need to take photos and or record videos in security-related areas at Kozloduy NPP, Permit for Photo Taking and Video Recording for external individuals (Appendix 2) and Declaration of Confidentiality (Appendix 3) shall be completed.
  2. The Permit shall be agreed by the Safety and Quality Director and by the Head of Security Division, approved by the Chief Executive Officer of Kozloduy NPP EAD, and registered in the Site Pass Office (Access Control Systems Operation Section, Security Division).
  3. In case of events of public interest covered by a large number of media, the photographing and filming shall be authorised by the individual responsible for the event. When completing the authorisation form for access to Kozloduy NPP protected areas, the Site Pass Office officers (Access Control Systems Operation Section, Security Division) shall prepare a list of photography and video equipment and record the data of individuals who will use it.

# Provision of photos, video frames, videos and multimedia products owned by Kozloduy NPP EAD

Photos, video frames, videos and multimedia products shall be provided to external organisations upon sending a letter to Kozloduy NPP EAD Chief Executive Officer with well-grounded request specifying the reasons and goals that require the provision of requested photos, video frames, videos and multimedia products. They shall be provided by means of Hand-Over Certificate (Appendix 6).

# 4. Obligations

External individuals who take photos and videos at Kozloduy NPP site shall:

* Carry the Permit for Photo Taking and Video Recording and present it upon request by Kozloduy NPP On-site Police Department officers and Security Division officers;
* Not take photos or film in resting rooms, sanitary and service premises;
* Not take photos and videos of elements of Kozloduy NPP physical protection;
* Not take photos and make videos of sites, facilities and areas not specified in the Permit for Photo Taking and Video Recording;
* Use only photography and video equipment specified in the Permit for Photo Taking and Video Recording;
* Carry the photography and video equipment switched off and with protective covers on until reaching the facilities to be photographed or video-taped;
* Not take photos or videos which would enable personal identification of individuals without their explicit written consent;
* Not take photos or videos that may form a negative perception or instil impressions that harm the image of Kozloduy NPP EAD;
* Return the Permit for Photo Taking and Video Recording (Appendix 2) to the Site Pass Office (Access Control Systems Operation Section, Security Division) upon completion of the activities specified in the Permission or upon its expiry;
* Upon request, provide the photos or videos made to the Security Division and/or by the Safety and Quality Directorate for approval.

# 5.Definitions

**Personal data –** “Personal data” means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

# 6. References

* 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
* Personal Data Protection Act
* Regulation on Ensuring the Physical Protection of Nuclear Facilities, Nuclear Material and Radioactive Substances
* Decree of the Council of Ministers No. 181 of 20 July 2009
* Statement of the Committee on Personal Data Protection, reg. No. П-763/2014.

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| town of Kozloduy, +359 973 7 2020, fax: +359 973 80591 |

**PERMIT FOR PHOTO TAKING AND VIDEO RECORDING**

(*for external individuals*)

For \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_,

(*specify the need for photo taking and video recording*)

The following individuals are authorised to take photos and record videos:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| No. | Name, middle name and surname | Organisation | Position | Access card No. |
|  |  |  |  |  |
|  |  |  |  |  |

The specified individuals are authorised to bring in and out of the security-related areas of Kozloduy NPP the following equipment:

|  |  |  |  |
| --- | --- | --- | --- |
| No. | Brand | Model | Serial number |
|  |  |  |  |
|  |  |  |  |

Areas for which the Permit is valid:

|  |  |
| --- | --- |
| No. | Buildings and facilities in which the photo taking/video recording will take place: |
|  |  |
|  |  |

Period: from \_\_\_\_.\_\_\_\_.202\_ to \_\_\_\_.\_\_\_\_.202\_

**Agreed by:**

**Safety and Quality Director: Head of Security Division:**

*/name, surname and signature/*  */name, surname and signature/*

**CHIEF EXECUTIVE OFFICER:**

***/name, surname and signature/***

|  |  |
| --- | --- |
| *Reg. No. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_/\_\_.\_\_.20\_\_*  *Signature and stamp:*  *(To be filled in by Access Control Systems Operation Section, Security Division)* | Escort *(name, position, signature)*:  \_\_\_\_.\_\_\_\_.202\_ |

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**DECLARATION**

**regarding confidentiality and personal data protection**

|  |
| --- |
| I, the undersigned ...................................................................................................  */name, middle name and surname/*  PIN ............................, ID card No. ………………….. , issued ........................... by ...................... , mailing address: ......................................................................................  **hereby DECLARE that:** |

1. I am aware of:

- the regulations in the field of personal data protection (General Data Protection Regulation (GDPR), Personal Data Protection Act, etc.);

-the regulations stipulating the measures for physical protection of strategic sites important to the national security (Safe Use of Nuclear Energy Act, Regulation on Ensuring Physical Protection of Nuclear Facilities, Nuclear Material and Radioactive Substances, Decree No. 181 of the Council of Ministers of 20 July 2009, etc.);

- Rules for personal data protection at Kozloduy NPP and Privacy Notice.

2. I voluntarily provide information about myself which presents personal data within the meaning of the Personal Data Protection Act.

3. I give my explicit consent to Kozloduy NPP as a personal data controller to process the personal data provided by me in connection with my visit to the security-related areas at Kozloduy NPP EAD with the purpose of:

…………………………………………………………………………………………………………

…………………………………………………………………………………………………………

5. I give my explicit consent for my personal data to be provided to other personal data controllers, state authorities and institutions when required in fulfilment of a regulatory obligation and in compliance with all legal requirements.

6. I am aware of the rights I possess concerning the personal data processed for me, including:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

*/signature/*

- Right to information;

- Right to access;

- Right to rectification, erasure, etc.;

- Right to be defended in court or according to the administrative procedure by lodging a complaint to the Commission for Personal Data Protection.

7. I shall:

- Comply with the requirements specified in the Procedure on Photo Taking and Video Recording in Security-Related Areas at Kozloduy NPP;

- Use only photography and video equipment specified in the Permit for Photo Taking and Video Recording;

- Carry the photography and video equipment switched off and with protective covers on until reaching the facilities to be photographed or video-taped;

- Provide, upon request, the photos or videos made to the Security Division and/or by the Safety and Quality Directorate for approval;

- Not use the photos taken and videos recorded for purposes other than the one specified in the Permit for Photo Taking and Video Recording (for external individuals);

- Not use these photo and video materials to form a negative perception or instil impressions that harm the image of Kozloduy NPP EAD;

- Not provide the photo and video materials made to third parties without the authorisation of Kozloduy NPP EAD;

- Respect the confidentiality and not share the information obtained at Kozloduy NPP site.

I am aware that in case of provision of incorrect data or failure to fulfil the obligations assumed, I shall bear responsibility in accordance with the effective Bulgarian legislation.

|  |  |  |  |
| --- | --- | --- | --- |
| Date: |  | Declarant: |  |

*/name, middle name, surname and signature/*

**This declaration must be signed by the declarant on each page!**

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**PERMIT FOR PROVIDING**

**PHOTOS, VIDEO FRAMES, VIDEOS AND MULTIMEDIA PRODUCTS**

Photographed (video recorded) site/topic: …………………………………………………

Number of photos to be agreed: …. photos, … sheets.

(duration - for video frames)

Purpose: …………………………………………………………………

**Proposed by,**

Head of Information Centre:…………………………….....

(signature)

**Agreed by,**

Head of Administration and Control Division …………… Head of Security Division …………..

*(as needed) (signature) (as needed) (signature)*

**Received by,**

**………………………………………………………………………………………………………..**

*(name, surname and position)*

**……………………...............................................................................................................................**

*(organisation, phone)*

Date: …………. Signature: ………………….

**Sent to:**

**…………………………………………………………………………………………………………**

*(name and surname of the recipient, organisation, date)*

*An e-mail printout or other shall be attached.*

**APPROVED,**

**SAFETY AND QUALITY DIRECTOR**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

*(signature)*