



"Camera Field" - Product Disclaimer Notice

This Disclaimer Notice outlines roles, responsibilities, and liability limitations for using the Camera Field accessory with Thread X3. It emphasizes compliance with GDPR and urges users to review it carefully.

Parties and their GDPR roles

- (a) **Controller:** A customer or partner (user) who has acquired, installed, and contracted Bentley's SaaS service and/or other compatible solution for monitoring and visualization purposes, as directly mentioned in the Product Data Sheet.
- (b) Main Data Processor: Bentley Systems, a USA-based company that commercializes and holds exclusive rights to its software (Sensemetrics SaaS solution). The processing of personal data is regulated under Bentley System's Data Processing Addendum.
- (c) **Sub-Processor:** Worldsensing, a Spain-based company that commercializes and holds an exclusive right to its firmware for signal data encryption and transmission, and to its software CMT Cloud for the management of IoT infrastructure.

Data Flow¹

CAPTURE VISUALIZATION STORAGE **Bentley Bentley**® Hardware: Capture Property:Customer Storage: Server Software (model Saas) GDPR Role: Data (Public cloud) Property: Bentley Data processing Data processing Property: Bentley Controller contract Country USA contract Country: USA GDPR Role: Data Processor GDPR Role: Data Processor **USE** USF WORLD WASENSING SENSING Image Firmware: data transmission & CMT Software (model SaaS)* Property: Worldsensing encryption Property: Worldsensing S.L. Country: Spain and Ireland GDPR Role: Data Processor GDPR Role: Data Subprocessor *interconnection of the SaaS Systems for the visualization of both hardware. Thread and Employees/Public space Loadsensing products (optional configuration) (third parties) GDPR Role: Data subjects

¹ The data flow sketch provided above may contain errors or inaccuracies. It is intended for illustrative purposes only and should not be relied upon as a precise representation of the actual data flow process.



I. **Limitation of Liability**

- (a) The Controller is responsible for information and transparency obligations and shall be GDPR compliant for the final use of the Camera Field accessory, as established in clause IV herein.
- (b) Bentley Systems is responsible for Sensemetrics SaaS solution and/or any incident connected with its operation. The potential liabilities are determined under the applicable Terms of Use and Privacy Policy.
- (c) Worldsensing is responsible for Camera Field's hardware and firmware operation during the warranty period established by the applicable Terms and Conditions². If the CMT SaaS is contracted, then the terms of the associated Service Level Agreement will also apply.

II. GDPR compliance

- 1. The individual responsible for installing and controlling the Camera Field accessory shall be deemed a Data Controller under art. 24 of the GDPR. For further details. please refer to this role in Guideline 07/2020.
- 2. The Controller is accountable for meeting information and transparency obligations regarding data processing. Please refer to Guideline wp260rev.1 for more information.
- 3. In accordance with employment and privacy laws, the Controller must inform employees and third parties about the implementation of video surveillance technologies. In Europe, you can utilise the video surveillance sign provided in Guideline 3/2019.
- 4. It is recommended to refrain from installing video surveillance in areas where there is a common expectation of privacy, such as: (a) in front of private residences, (b) bathrooms, (c) dressing rooms, (d) restrooms, (e) wide-angle coverage of public areas.
- 5. Ensure that the video surveillance activity undergoes the appropriate Privacy Impact Assessment (PIA) if required by law. Worldsensing PIA public content can be used upon written request to legal@worldsensing.com. For more details, please refer to Guideline wp248rev.1.
- 6. GDPR provisions also include extraterritorial obligations outside of Europe. For additional information, please consult <u>Guideline 3/2018</u>.

III. Security

The images captured with the Camera Field accessory are encrypted and protected by default. Worldsensing has implemented appropriate technical measures to ensure the confidentiality, integrity and availability of data, as mandated by Art. 24 and Art. 32 of the GDPR. If utilized, the XBee wireless connectivity protocol may operate without encryption.

²The applicable Worldsensing's General Terms and Conditions are indicated in the issued Invoice on the date of product acquisition.