

PRIVACY POLICY RELATING TO VIDEO SURVEILLANCE IMAGES

Privacy policy pursuant to Article 3.1 of the Measure issued by the Italian Data Protection Authority (Garante) dated 8 April 2010 and Article 13 of EU Regulation 2016/679

We inform you that your personal data is processed through video surveillance systems in accordance with the principles of correctness, lawfulness and transparency to protect your privacy and your rights, according to the methods specified below.

DATA CONTROLLER

The Data Controller is GIESSEGI INDUSTRIA MOBILI S.p.a US, Via Bramante, 39, Appignano (MC), telephone +39 0733 400811, email info@giessegi.it, privacy@giessegi.it

NATURE OF PROCESSED DATA

The processing concerns data acquired through video surveillance systems

PURPOSE AND LEGAL BASIS OF THE PROCESSING

The personal data of data subjects, and specifically the image recordings, are collected for the following purposes:

- organisational and production purposes related to the control of automatic and semi-automatic machinery in order to ensure their effective operation and prevent dangerous situations for the machinery itself, the products processed by them and the people working in the surrounding area;
- protection of company assets against possible theft, damage, vandalism or other illegal acts that may occur in the areas subject to video surveillance, both during the day and at night
- as a complementary measure aimed at improving safety inside or outside buildings or plants where production, industrial, commercial or service activities are performed, or which have the purpose, as means of proof, of facilitating the possible exercise of the right of defence of the data controller or third parties, in civil or criminal proceedings, on the basis of images that are useful in the event of unlawful acts

Data is processed on the basis of the legitimate interest of the Data Controller (Article 6(1)(f) of the GDPR and Article 6.2.2. of the Measure dated 8 April 2010)

PROCESSING METHODS

The video surveillance system is equipped with external and internal cameras and allows the recording and viewing of images in real time.

The video surveillance system is in operation 24 hours a day, 7 days a week.

The images taken by the video surveillance system can only be viewed by the data controller or by persons specifically assigned the task in writing by the data controller;

The data is processed using procedures and tools including IT tools, suitable for ensuring the security and confidentiality in the ways and within the limits necessary to achieve the aforementioned purposes and in compliance with the following principles:

- **Lawfulness:** the data is processed fairly and in accordance with the principle of balancing interests, for the legitimate purposes described above. The systems are used in compliance with Article 4 of the Workers' Statute (Italian Law 300/70).
- **Necessity:** excesses and redundancies in data processing, camera positioning, and image recording are avoided.
- **Proportionality:** the data collected is strictly necessary to achieve the purposes specified above.

IMAGE RETENTION PERIODS

The images are recorded and stored for a period of 72 hours, except for holidays and company closures in general, with subsequent automatic erasure.

Retention may be extended if there is a need to store the data as evidence to facilitate the possible exercise of the right of defence of the Data Controller or third parties in the event of unlawful acts, and also if it is necessary to comply with a specific request in investigations from the Judicial Authority or the Police.

In this case, the processing will continue for the duration of the litigation and/or proceedings.

PROVISION OF DATA

The provision of data via video surveillance is essential, as it is required when accessing the premises and areas. Refusal to provide such data when accessing video-monitored areas may make it impossible to access the facility.

PRIVACY POLICY

Data subjects being monitored by video surveillance are appropriately notified of the processing by means of concise information notices (signs) posted near the video-monitored areas, before reaching the camera cone.

SCOPE OF DATA KNOWLEDGE

The following may gain knowledge of your data: internal and external parties authorised to manage and maintain the video surveillance system. These parties are categorised as Data Processors, are designated in writing and authorised to access the premises where the systems and control stations are located, use the systems themselves and, where essential for the relevant purposes, view and/or copy the images.

DISCLOSURE AND DISSEMINATION

The data may be disclosed only to parties who may have access to the data pursuant to legal, regulatory or EU legislative provisions, within the limits set by such provisions – such as Police Forces, Judicial Authorities or the Judicial Police – in response to specific requests and authorisations.

RIGHTS OF DATA SUBJECTS

At any time, pursuant to Articles 15-22 of EU Regulation 2016/679 and relating to the processing of data derived from video surveillance systems, you may exercise your right to:

- request confirmation of whether or not your personal data exists;
- obtain information regarding the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom your personal data has been or will be disclosed and, where possible the data retention period;
- obtain the rectification or erasure of data when no longer necessary for the purposes of the processing, if the legal conditions exist and the processing is not justified by any other legitimate reason;
- obtain the restriction of processing, where the conditions exist, including inaccuracy, objection to the processing, or unlawful processing.
- lodge a complaint with a Supervisory Authority: without prejudice to any other administrative or judicial action, the complaint may be submitted to the Italian Data Protection Authority (in Italy www.garanteprivacy.it, Tel. +39 06696771, email urp@gdpp.it).

To exercise these rights, you can contact the Data Controller with an informal request, who can be contacted at the following: telephone +39 0733 400811, email info@giessegi.it, privacy@giessegi.it, or the Head of the video surveillance systems, Luca Papa