



PRIVACY NOTICE -
VIDEO SURVEILLANCE
(on website for signage)

V. 1.00.00

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VIDEO SURVEILLANCE PRIVACY NOTICE AS PER ART. 13, RECITALS 60-62, REGULATION (EU) 2016/679 (“GDPR”)

DATA CONTROLLER

ALMECO S.P.A.

Address: Via della Liberazione,15 – 20098 Civesio, San Giuliano Milanese (MI)

Telephone: +39 02 9889631

Fax: +39 02 98896399

Email: info.it@almecogroup.com

PEC certified email: almeco@registerpec.it

VAT no. and tax code and ITVAT: 00772590154

Share capital: €30,000,000 fully-paid

Economic and Administrative Index (REA): 687991

Milan Chamber of Commerce

www.almecogroup.com/it

DATA PROTECTION OFFICER (DPO)

MICROELL Srl (contact Francesco Traficante)

Via Mazzini 19b, 21052 Busto Arsizio (VA)

Email: dpo@almecogroup.com

PRINCIPLES

One of our fundamental objectives is the protection of personal data.

The data are processed in a lawful, proper and transparent manner, must be adequate, relevant and limited to what is necessary, accurate and, if necessary, updated, collected for specific, explicit and legitimate purposes pursuant to articles 5 and 6 of the EU Data Protection Regulation 2016/679 and based on the provision of consent where needed.

The data are processed in such a way as to ensure their adequate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage (integrity and confidentiality) through appropriate technical and organisational measures.

We notify users in the event of substantial changes to this Privacy Policy and the related data processing, providing the option to authorise us or otherwise to process the data for the purposes set out below.

SOURCES OF PERSONAL DATA

Collected from the Data Subject:

Offices of the Data Controller

CATEGORIES OF DATA SUBJECTS

Visitors: consultants, suppliers, clients, etc.

CATEGORIES OF PERSONAL DATA PROCESSED

COMMON

- **Images:** recordings from the video surveillance system

PURPOSES OF THE PROCESSING

VIDEO SURVEILLANCE

DESCRIPTION OF THE PURPOSES AND LEGAL BASIS FOR THE PROCESSING

Video Surveillance System.

Purpose:

- **Protection of company assets:** access control, establishment of any responsibility for wrongdoing, presence of intangible assets or components with high intrinsic value, presence of high-value assets, and presence of company areas designated exclusively for authorised parties.
- **Occupational health & safety:** need to ensure rapid response of emergency teams in case of accidents, areas at risk according to the Risk Assessment Document (DVR) according to Italian Legislative Decree 81/08 on Occupational Health & Safety.

Legal Basis for Processing:

- Legitimate Interest of the Data Controller

Occupational Health & Safety legislation (Italian Legislative Decree 81/08)

DURATION OF THE PROCESSING AND STORAGE PERIOD*

- Duration and Storage up to 72 hours and periods corresponding to the closure of activities, followed by immediate deletion.
- Duration of the in- or out-of-court dispute until the claims are time-barred.

Duration and Storage for the time strictly necessary for the obligation of data retention and/or delivery to comply with a specific request of the judicial authority or the police.

RECIPIENTS OF THE DATA

The data may be disclosed and processed by external parties acting as independent data controllers such as, by way of example:

Italy:

- a. Authorities and supervisory and control authorities;
- b. Judicial authority and Police;
- c. Generic public institutions;
- d. Insurance companies;
- e. Adjusters and liquidators;
- f. Law firms;

The data may also be processed on behalf of the Company by external parties designated as data processors, to which appropriate operating instructions are given. These parties are essentially included in the following categories:

Italy:

- g. Parties that offer professional consulting services, including in service companies or in associated form;
- h. Parties that offer guard services;
- i. Parties that offer IT services;

Parties that offer private security services.

OBLIGATORY NATURE OF THE PROVISION OF DATA

The provision of data is required in relation to the purpose referred to in point 1 and therefore any refusal to provide this information in whole or in part may mean that the Data Controller will be unable to grant the Data Subject access to the company premises.

PARTIES AUTHORISED TO PROCESS THE DATA

The data may be processed by employees and workers of the business functions, herein including subjects receiving communications, assigned to carry out the above purposes, who have been expressly authorised to process the data, who have received appropriate operating instructions, and who have been adequately informed and trained (internal subjects).

TRANSFER OF THE PERSONAL DATA TO NON-EU COUNTRIES

Any transfer of data outside the EU/EEA will take place in compliance with the principles and conditions set out by the legislation.

RIGHTS OF THE DATA SUBJECT – LODGING COMPLAINTS WITH THE SUPERVISORY AUTHORITY

By contacting the Data Controller by email at privacy@almecogroup.com, Data Subjects may ask the Data Controller to give them access to their data, block and anonymise their data, correct inaccurate data, complete incomplete data, restrict processing in the cases envisaged by article 18 of the GDPR, as well as object to processing in the case of the legitimate interest of the Data Controller.

The data controller shall provide the data subject with the information relating to the request for the exercise of the data subject's rights (pursuant to articles 15 to 22 of the GDPR) without undue delay, and in any event at the latest within one month of receiving the request, as envisaged in article 12 of the GDPR.

Furthermore, in the event that the processing is based on consent or a contract and is performed with automated tools, the data subjects have the right to receive the data in a structured, commonly used and machine-readable format, and, if technically feasible, to have them sent to another data controller without impediment (Right to Portability), and to request the simultaneous or subsequent definitive cancellation of such data (Right to Be Forgotten).

If the processing is based on consent for one or more purposes (art. 6, paragraph 1, letter A of the GDPR) and for the processing of particular data (art. 9, paragraph 2, letter A of the GDPR), the withdrawal of consent at any time does not affect the legality of the processing based on consent before such withdrawal.

Data subjects shall have the right to lodge a complaint with the Supervisory Authority having jurisdiction in the Member State of their habitual residence, place of work or place of the alleged infringement.