

POLICY FOR THE PROCESSING OF VISITORS' PERSONAL DATA

L.M. dei F.lli Monticelli S.p.A. wishes to inform you about the processing of your personal data.

This information is provided in accordance with the principles of transparency and fairness and in compliance with your rights, pursuant to the EU Data Protection Regulation 2016/679 (GDPR).

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DATA CONTROLLER

The data controller is L.M. dei F.lli Monticelli S.p.A., Via Giuggioli, 30, Osimo (AN), established in the European Union, which can be contacted at the following addresses: telephone +39 071 7230252, email info@monticelli.it.

DATA PROTECTION OFFICER ('DPO')

L.M. dei F.lli Monticelli S.p.A., has identified a Data Protection Manager, who can be contacted for any information concerning the processing of personal data, the exercise of data subjects' rights, the security policies and measures adopted, and the list of persons in charge of processing personal data.

The Data Protection Officer can be contacted at: dpo@organizzazione.dominio

PRIVACY CONTACT POINT

L.M. dei F.lli Monticelli S.p.A. has a privacy contact point, which can be contacted for any information concerning the processing of personal data, the exercise of the data subjects' rights, the security policies and the measures adopted, and the list of persons in charge of processing personal data.

The contact point can be reached at: privacy@monticelli.it

SOURCE OF DATA

Data are acquired directly from you, and are provided when you enter our offices and facilities.

Some data are acquired digitally through the ID badge system, which is generated at the time of your entry.

In some circumstances, your personal data may be provided by your organisation in advance during the organisation of the visit.

PERSONAL DATA CATEGORIES

The treatment concerns:

- personal identification data, such as first and last name, company name, or organisation name
- contact details: email, telephone
- date and time of entry, time of exit
- Images taken by video surveillance systems, for the processing of which please refer to the specific information sheet.
- Badge and digital identification numbers (e.g. ID, entry/exit logs) generated by the badge generation and allocation system
- Digital identification (IP address, MAC address, telephone number, user ID) to manage guest wifi network access

Depending on the purpose of the visit, you may be asked to show an identification document, which will be inspected by the operators in charge, without transcription of the details.

As a general rule, personal data that can be qualified as 'special', i.e. data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data intended to uniquely identify a natural person, or data concerning a person's health or sex life or sexual orientation are not processed.

Should there be a specific need to acquire and process data of a specific nature, we will inform you of this by supplementing this information notice

PURPOSE AND LEGAL BASIS OF PROCESSING

Your personal data will be processed for the purpose of identifying you and to record your entry and exit to the establishment. Identification is carried out for purposes related to:

- the organisational management of the visit to the plants and offices, also from a security point of view, for the correct and timely management of any safety equipment (PPE) required for access
- the protection of those who are in the establishments, even temporarily, to record their presence in the event of accidents, and to effectively activate emergency or evacuation plans
- the prevention and possible prosecution of all types of offences and violations of internal rules of conduct, protecting company assets and personnel, including computer security, in the case of guest wifi accesses
- the formation of the visitors' register
- for statistical purposes

For the purposes of workplace safety, the legal basis for processing is the legal obligation (Art. 6(1) (c) of the GDPR). For organisational requirements and the protection of corporate assets, the legal basis is the legitimate interest (Art. 6 (1) (f) of the GDPR).

PROCESSING METHODS

Data are processed using procedures and tools, including computer means, suitable for guaranteeing their confidentiality, integrity and availability in the manner and within the limits necessary for pursuing the aforementioned purposes and in accordance with the technical security and organisational measures implemented within our organisation.

Your personal data are processed exclusively by authorised and trained personnel, who are granted access to said data to the extent and within the limits necessary for the performance of the processing activities.

Data that are surplus to requirements or irrelevant to the purposes of processing will be deleted or not used except for the possible retention, in accordance with the law, the act or document containing them.

AUTOMATED DECISION-MAKING AND PROFILING

No automated decision-making processes are used, including profiling or the use of intelligent or integrated video surveillance systems

DURATION OF PROCESSING

The visitors' register and data collected to allow access to the premises and offices will be kept for a maximum of **6 months**, after which they will be deleted or anonymised (e.g. for statistical purposes).

Images collected by video surveillance systems are retained for 48 hours unless the retention period is extended in the event of offences. In this case, the images will be retained as evidence until the end of the relevant proceedings, whether internal or judicial, with any competent authority.

The data may be processed for a longer period in connection with further deadlines set by any exceptions imposed by the authorities (e.g. requests for inspections, disputes and assessments) or resulting from litigation if this entails an extension of the retention period.

OBLIGATION OR OPTION TO PROVIDE DATA

The provision of personal data, including the possible production of an identity document, is compulsory for access to establishments and offices.

In the event of refusal to provide such personal data, access to establishments may not be permitted.

DATA RECIPIENTS

Your data may be disclosed to the reception, internal administrative and secretarial offices, employees and collaborators. All persons accessing your data are duly authorised, instructed and bound by confidentiality obligations.

Your data may be communicated to

- public or private entities that may have access to it by virtue of provisions of law, regulations or Community legislation, within the limits provided for by these rules
- our consultants, to the extent necessary for them to perform their duties in our organisation, subject to designation imposing duties of confidentiality and security
- to entities that perform or provide specific services, e.g. IT service providers, providers entrusted with the maintenance of the access systems, security services, providers of video surveillance system maintenance services.

The communication of your personal data is limited exclusively to the data necessary to achieve the specific purposes for which they are intended.

All entities that process data on behalf of the firm are identified as Data Processors, bound to comply with measures aimed at ensuring the protection of your personal data, pursuant to Article 28 of the GDPR.

Your data will not be disseminated (e.g. by publishing images of your visit on the web), unless we expressly request and you expressly consent.

TRANSFER OF PERSONAL DATA OUTSIDE THE EU

Your personal data will not be transferred to third parties outside the European Union.

DATA SUBJECT'S RIGHTS

You may exercise your rights under Articles 15 to 22 of EU Regulation 2016/679, namely:

1. request confirmation of the existence or otherwise of their personal data being processed;
2. obtain information about the purposes of the processing, the categories of personal data processed, the recipients or categories of recipients to whom the personal data have been or will be disclosed, the period of data retention or the criteria for determining it;
3. update or rectify personal data, so that they are always accurate;
4. delete personal data when no longer necessary for the purposes of the processing, if the conditions of the law are met and the processing is not justified by any other legitimate reason;
5. restricting the processing of personal data if the conditions are met, including inaccuracy, objection to processing, unlawful processing.
6. obtain the portability of the data, where the processing is carried out on the basis of a contract and by automated means, i.e. receive them in a structured, commonly used and machine-readable format, also for the purpose of transmitting them to another data controller;
7. object to processing at any time and also in the case of processing for direct marketing purposes or carried out by means of automated decision-making processes, including profiling.
8. withdraw consent, if given for specific processing activities. Withdrawal of consent does not affect the lawfulness of processing based on consent given prior to the withdrawal;
9. the right to lodge a complaint with a Supervisory Authority: without prejudice to any other administrative or judicial action, a complaint may be lodged with the Italian Data Protection

Authority (in Italy www.garanteprivacy.it, tel. 06.696771, email urp@gpdp.it). Or, if the conditions are met, including your different residence or the different Member State where the infringement took place, with the control authorities established in another EU country.

In order to exercise these rights, you may contact the Data Controller, L.M. dei F.lli Monticelli S.p.A., whose contact details are provided at the beginning of this information notice, which will examine the issue without delay.

If L.M. dei F.lli Monticelli S.p.A. intends to process data for purposes other than those set out in this privacy policy notice, it will inform you before doing so and obtain your consent if necessary.

UPDATES

L.M. dei F.lli Monticelli S.p.A. updates the internal policies and practices adopted in the protection of personal data whenever necessary, and in the event of regulatory and organisational changes affecting the processing of personal data.

Any updates to this notice will be made available in a timely manner and by appropriate means.