

POLICY FOR DATA PROCESSING THROUGH VIDEO SURVEILLANCE

Policy statement pursuant to Art. 3.1 Order of the Data Protection Authority of 8 April 2010 and Art. 13 of the Regulation (EU) 2016/679



We hereby inform you that the processing of your personal data by means of video surveillance systems is carried out in accordance with principles of fairness, lawfulness and transparency, to protect your privacy and your rights, in the manner specified below.

DATA CONTROLLER

The data controller is L.M. dei F.lli Monticelli S.p.A., Via Giuggioli, 30, Osimo (AN), telephone +39 071 7230252, email info@monticelli.it

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 rights of the data subjects, 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

NATURE OF THE DATA PROCESSED

The processing concerns data acquired through video surveillance systems.

PURPOSE AND LEGAL BASIS OF PROCESSING

The personal data of the persons concerned, and specifically the recorded images, are collected for the following purposes:

- protection of company assets against possible theft, damage, vandalism or other unlawful acts that may occur in areas subject to video surveillance, both during the day and at night
- complementary measure aimed at improving security inside or outside buildings or installations where production, industrial, commercial or service activities are carried out, or which have the purpose, as a means of proof, of facilitating the possible exercise, in civil or criminal proceedings, of the right of defence of the data controller or of third parties on the basis of useful images in the event of unlawful acts

Data processing is carried out on the basis of the legitimate interest of the data controller (Art. 6 (1) (f) of the GDPR and Art. 6.2.2. of the Order of 8 April 2010)

PROCESSING METHODS

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

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

The viewing of images taken by the video surveillance system is only done by the data controller or persons

specifically instructed by the data controller in writing;

Data are processed using procedures and tools, including computer means, suitable for guaranteeing their security and confidentiality within the limits necessary for pursuing the aforementioned purposes and in accordance with the following principles:

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

IMAGE RETENTION TIMES

Detected images are recorded and stored for a period of 48 hours, except for those from public holidays and company closures in general, with subsequent automatic deletion.

Retention may be extended in the event of the need to store images as evidence to facilitate the possible exercise of the right of defence of the data controller or of third parties in the event of unlawful acts, and also in the event of the need to comply with a specific investigative or judicial authority or police request.

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

DATA PROVISION

Data provision via video surveillance is necessary, as it is instrumental for access to premises and areas. Refusal to provide such data, when accessing the video-monitored areas, may result in the inability to access the facility.

PROCESSING INFORMATION

Data subjects who appear in video-surveillance footage are notified of processing in advance by means of summary info notices (signs) posted in the vicinity of the video-surveillance areas.

SCOPE OF DATA KNOWLEDGE

Internal and external persons authorised to operate and maintain the video surveillance system may gain knowledge of the data. These persons are classified as Data Processors or Authorised Processors; they are designated in writing and are authorised to access the premises where the installations and control stations are located, to use the installations themselves and, in cases where it is indispensable for the purposes pursued, to view the images and/or make copies.

COMMUNICATION AND DISSEMINATION

Data may only be communicated to persons who can access the data by virtue of a provision of law, regulation or Community legislation, within the limits provided for by such legislation, such as the Police Force, Judicial Authorities or Judicial Police, subject to specific request and authorisation.

DATA SUBJECT'S RIGHTS

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

- request confirmation of the existence or otherwise of their personal data;
- obtain information on the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data have been or will be disclosed and, where possible, the retention period;
- obtain the rectification and erasure of data when no longer necessary for the purposes of processing, if legal conditions are met and the processing is not justified by any other legitimate reason;
- obtain the restriction of processing if the conditions are met, including inaccuracy, objection to processing, unlawful processing of data.

- 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. +39 06.696771, email urp@gpdp.it).

To exercise these rights, contact the Data Controller, who can be reached at the following addresses: telephone +39 071 7230252, email info@monticelli.it, or at the privacy contact point, privacy@monticelli.it.