

Information pursuant to art. 13 of EU Regulation 2016/679 and art. 3.1 of the Provision issued by the Italian Data Protection Authority regarding video-surveillance dated 8 April 2010

In compliance with article 13 of Regulation 2016/679 (EU) (Regulation) and art. 3.1 of the Provision issued by the Italian Data Protection Authority regarding the protection of personal data dated 8 April 2010, the **Delphina SpA** company in its capacity as Data Controller of personal data

HEREBY STATES

that in our facilities a closed-circuit video surveillance system is in operation according to the Provision issued by the Italian Data Protection Authority on 8 April 2010.

Purpose of the treatment

The personal data of interested parties, taken specifically from images of the same acquired through recordings are collected exclusively for the following purposes:

1. Security: protection of the safety of workers and/or collaborators of the company, as well as of third parties;
2. Protection of company assets: prevention of thefts, robberies, damage, assaults, acts of vandalism.

The processing of data is legitimately carried out even in the absence of explicit consent by the parties concerned, pursuant to art. 6.2.2.1 of the Provision by the aforementioned Authority.

Processing methods

The data is processed electronically in compliance with appropriate security measures and protection of the same and always for the purposes mentioned above. In particular, in the processing of data, the company declares that it abides by the following principles.

- Legality of processing: the processing of data through video surveillance is carried out correctly and for specific and legitimate purposes (security and protection of company assets). The systems have been installed and are used in compliance with art. 4 lgs. 300/1970.
- Need for processing: the company undertakes not to use the system in an excessive and unnecessary way.
- Proportional use of processing: the data collected is only that which is strictly necessary for the achievement of the purposes referred to in the previous point.

Data distribution and communication to third parties

For the aforementioned purposes, the images may be viewed in real time via the dedicated monitors by the personnel in charge, as well as by persons in charge of data management, monitoring and operation of the Delphina SpA technological systems; the recorded images may be viewed by persons specifically designated for this purpose, by the Data Processor and by the Data Controller. In the case of occurrences of damage and criminal events, the recorded images may be transferred with appropriate IT support to be delivered to the competent authorities.

Minimum information

Subjects involved in the processing are appropriately notified by means of signs (simplified information) in the areas and premises subject to video surveillance activities. The aforementioned signs contain all the information required by art. 3 of the Provision.

Image retention times

The images involved are recorded and stored in accordance with the Provisions of 8 April 2010. In particular, the acquired data will not be stored for a period exceeding 7 days; once this time limit has been exceeded the data will always be deleted by over-recording, except as provided for in the Provision in case of request by the Authorities or Judicial Police or otherwise as a result of criminal events, damage to corporate assets, unauthorized access to the building on the part of personnel and/or third parties, theft of materials and company products.

Data Controller

The owner of the processing of personal data is Delphina SpA.

Designation of the Data Processor and processing authorization

The Data Controller has designated the Data Processor in writing as well as those processing personnel authorized to access both the premises where the control locations are sited, and to use the facilities and, in cases where it is indispensable for purposes pursued, to view the images and/or make copies in accordance with the provisions of art. 3.3.2 of the Provision.

Rights of the interested party

Subjects to whom the personal data refer have the right at any time to obtain confirmation of the existence or otherwise of the same data and to know its content and origin, verify its accuracy or request its integration or updating, or rectification (article 15 and following of the relative EU Regulation).

Furthermore, the interested parties have the right to request the correction of incorrect personal data, the deletion, limitation of processing and portability of data as well as the right in any case to present a complaint to the supervisory authority and to oppose their processing for legitimate reasons. (Article 17 ss of the Provision).

Requests should be addressed to the Data Controller, Delphina SpA with administrative Headquarters in Palau - 07020, Loc. Cala di Lepre. e-mail: privacy@delphina.it.