

Marchesini Group SpA

Legal and Administrative Headquarters:
Via Nazionale, 100 | 40065 PIANO | BO | ITALY
+39.051.0479111 | fax +39.051.6516457
info@marchesini.com



REA Bologna No. 327089
Registration Company Reg. of Bologna and Fiscal Code: 03:
VAT number IT00680201209 - Position number M.BO: 029
pec@pec.marchesini.com
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VIDEO SURVEILLANCE PRIVACY POLICY

Ed.02

DPMS

Data Protection Management System

Compliance with EU Regulation 2016/679

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REVISIONS

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Functions involved in the issuing process, facing related responsibilities: Paola Zanellati (DPO) – Giordano Berta (External Consultant)			
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Attention! This document is aimed at natural persons who for any reason intend or are forced to access the area subject to video surveillance. These natural persons are considered interested parties pursuant to art. 4 of the Regulation.

0. DOCUMENT TAB

0.1. REVISION TABLE

Ver.	Date	Publication process	Description of the change
*00	01/01/2024	Issued by: CPDA Verified by: CFO Approved by: DDT	First issue in the DPMS system

Attention! This document replaces the previous video surveillance privacy information released on 25/05/2018

0.2. NORMATIVE REQUIREMENTS

Title	Note
EU Regulation 2016/679	General Data Protection Regulation (GDPR)
Legislative Decree 196/2003	Privacy Code
Legislative Decree 101/2018	Implementation decree of EU Reg. 2016/679
L. 300/70	Workers' Statute

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1. RECIPIENTS OF THE DOCUMENT

This document is aimed at natural persons who for any reason intend or are forced to access the area subject to video surveillance of the company **Marchesini Group S.p.A.** (hereinafter simply “Company” or “Marchesini”).

2. PREMISE

In compliance with the indications provided for by Regulation (EU) 2016/679 (hereinafter, "Regulation" or "GDPR") regarding the processing and free movement of personal data, you have the right to know all the information regarding the processing of personal data. Your personal data in a clear and transparent way. Therefore, in compliance with this principle, we intend with this document to inform you regarding the processing of your personal data relating to the video surveillance system, also reporting the provisions of art. 13 of the Regulation.

This information supplements the short information released through the appropriate signage placed on the perimeter of the video-surveillance area.

3. DEFINITIONS

The definitions of the terms used in this document are to be understood as per art. 4 of [EU Regulation 2016/679](#).

4. DATA CONTROLLER OF PERSONAL DATA

Marchesini Group S.p.A. (hereinafter simply **Marchesini**) is the Owner of the Processing of your personal data pursuant to the Regulation. Below is the contact information:



Marchesini Group S.p.A.

Legal and operative site: Via Nazionale, 100 - 40065 Pianoro (BO) Italy

VAT no IT 00680201209 – Tax code: 03943970370 - REA code: BO - 327089

PEC: pec@pec.marchesini.com

Telephone+39 051 0479111

e-mail: privacy@marchesini.com

4.1. DATA PROTECTION OFFICER - DPO

Marchesini has appointed the Personal Data Protection Officer. You can contact the Data Protection Officer (DPO) at the following email address: dpo@marchesini.com.

4.1. DATA PROTECTION COORDINATOR

Marchesini also pursuant to art. 2-quaterdecies of Legislative Decree 196/2003 (so-called “Privacy Code”), has appointed a company Data Protection Coordinator with the task of supervising the compliance of processing with the GDPR.

The Data Protection Coordinator is at your disposal for any clarification or information regarding the processing of your personal data and to facilitate the possible exercise of the rights that are recognized by the Regulation.

You can contact the Data Protection Coordinator at the following email address: privacy@marchesini.com.


5. INFORMATION TO WORKERS

This facility is authorized pursuant to art. 4 Law 300/1970 (so-called "Workers' Statute") through a specific trade union agreement signed between the parties.


6. VIDEO SURVEILLANCE PROCESSING

The interested party has the right to know the purposes of the video recordings, the legal basis that makes the processing lawful, the processing methods, who can access the recorded data and the retention period of the images.


Why do we do this?

	<p>Purpose</p>
<p>Registration</p>	<p>We use the Video Surveillance system in order to improve the safety of workers, to protect our corporate and personal assets and the assets of third parties which for any reason are found within our company.</p>
<p>24 hours on 24</p>	<p>Recording is carried out continuously, i.e. 24 hours a day, 7 days a week.</p>
<p>7 days a week</p>	<p>This is necessary in order to verify, even during working hours, any unauthorized access, any damage or theft suffered or damage caused by third-party vehicles maneuvering in our courtyards.</p>


What is the legal basis of the processing?

	<p>We believe it is our legitimate interest to guarantee the safety of our workers, the protection of our corporate and personal assets and the assets of third parties who come to our company.</p>
<p>Legitimate Interest</p>	<p>The interested party has the right to object to the processing but we may continue to process your personal data if there are compelling legitimate reasons to proceed with the processing which prevail over your interests, rights and freedoms or when it is necessary for the 'establishment, exercise or defence of a right in court.</p>
<p>Art. 6.1 letter f</p>	
<p>GDPR</p>	


What are the retention criteria?

 <p>storage 72 hours</p>	<p>Storage is limited to 72 hours following registration, without prejudice to special needs for further storage in relation to holidays or closure of our offices as well as in the event that it is necessary to comply with a specific investigative request from the judicial authority or judicial police. Access to the recorded images will be carried out exclusively to verify specific events of violation or suspected violation of our rights to protect the safety of workers, property and property of third parties.</p> <p>At the end of 72 hours, the images are automatically deleted or overwritten by the recording system.</p>
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Is the data transferred abroad?


	<p>The interested party has the right to know whether his data is communicated to recipients in third countries outside the European Economic Area or to international organisations.</p> <p>For the purposes listed in this information, personal data is not transferred abroad.</p>
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Learn more about the treatment

 <p>Personal data Art. 4.1 GDPR</p>	<p>What type of personal data do we process?</p> <p>The video surveillance system deals exclusively with video images and single frames of the interested parties who access the controlled area or look out at the perimeter fence or gates. These frames are considered personal data pursuant to art. 4.1 of the Regulations.</p> <p>How do we process personal data?</p> <p>Personal data is acquired using cameras appropriately and regularly installed in compliance with current legislation. The acquired data is recorded in a special recorder and adequate technical and organizational measures have been adopted in order to protect its integrity and confidentiality (unauthorized access). The data from the perimeter cameras could be viewed in LIVE mode in order to control driveway or pedestrian access and damage caused by vehicles maneuvering in courtyards.</p> <p>Can the interested party refuse to provide the data?</p>
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	<p>The provision of data occurs automatically upon entry into an area subject to video surveillance. Sometimes the interested party is forced to make this entry to satisfy contractual obligations (e.g. employees going to work, collaborators, couriers, external technicians, supervisory bodies, etc.) and is not free to make a voluntary choice.</p> <p>What happens if he refuses?</p> <p>The interested party may fail to fulfill his contractual obligations with the Data Controller or third parties.</p> <p>In the limited cases in which the interested party is free to decide whether or not to access the video-surveillance area (e.g. guest), refusal will make it impossible to access the video-surveillance area.</p>
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Who can access personal data?

 <p>The interested party has the right to know the recipients or categories of recipients to whom the personal data have been or will be communicated</p>	<p>The personal data acquired by the video surveillance system will be accessible to the following subjects:</p> <ul style="list-style-type: none"> a. Our employees and collaborators in their capacity as Authorized Data Controllers. b. Professional companies/firms that provide assistance and/or consultancy to the Data Controller (e.g. in legal matters), as well as to third party service providers. <u>These subjects will process the data in their capacity as Data Controllers.</u> c. We may also communicate the data to the administrative, institutional and/or judicial authorities and to any other subject to whom communication is mandatory by law and/or for the fulfilment of the purposes indicated in this information. <u>These subjects will process the data in their capacity as independent data controllers.</u> <p>Attention!! Under no circumstances will the data be disclosed.</p>
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Who can identify the subjects filmed?



The interested party may be identified

Without prejudice to the interested party's right to voluntarily identify himself as the person filmed, in the event of a dispute or crime, the filmed subjects will be identified by the competent authority following a complaint. In compliance with any law in force on the matter, the Data Controller will make available to the authority all the necessary information in its possession in order to more quickly identify the subject being filmed.

7. ADDITIONAL RIGHTS

Without prejudice to what is highlighted in the previous points, taking into account the type of processing and in reference to the legal basis adopted by the Data Controller, the interested party is granted the following additional rights:

7.1. ACCESS (EX ART.15 GDPR)

The right to obtain confirmation as to whether or not we are processing personal data concerning you and, if so, to obtain access to the personal data processed.

The right to obtain a copy of the data being processed in electronic format. This right is applicable only if it does not lead to infringement of the rights and freedoms of others such as, for example, the presence of other identifiable subjects in the images and the lack of the possibility of anonymizing them safely at low costs through the deletion or masking of the parts of the frames that portray them. On this point, it is specified that if further copies are requested after the first one, an expense contribution based on our administrative costs may be charged.

7.2. CANCELLATION (EX ART.17 GDPR)

The right to obtain the deletion of personal data concerning him without unjustified delay if one of the following reasons exists:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed (see the retention criteria in point 9);
- b) the interested party has revoked the consent on which the processing is based and there is no other legal basis for the processing (not applicable);
- c) the interested party objects to the processing and there is no overriding legitimate reason to proceed with the processing;
- d) the personal data have been processed unlawfully;
- e) the personal data must be deleted to comply with a legal obligation to which our Company is subject.

7.3. LIMITATION (EX ART.18 GDPR)

The right to obtain the limitation of processing when one of the following hypotheses occurs:

- a) the data subject disputes the accuracy of the personal data. The limitation will apply for the period necessary to allow us to verify the accuracy of such personal data;
- b) the processing is unlawful and the interested party opposes the deletion of the personal data and requests instead that their use be limited;
- c) although we no longer need them for the purposes of the processing, the personal data are necessary for the interested party to establish, exercise or defend legal claims;
- d) the interested party has objected to the processing, pending verification of the possible prevalence of the legitimate reasons of the data controller with respect to those of the interested party.


7.4. NOTIFICATION (EX ART.19 GDPR)

The right to obtain from our Company direct communication to each of the recipients to whom the personal data have been transmitted by us regarding requests for erasure or limitation of processing, unless this proves impossible or involves a disproportionate effort. Furthermore, if he deems it appropriate, the interested party has the right to obtain from our company the list of recipients of his data.

7.5. COMPLAINT (EX ART.77 GDPR)

Without prejudice to the possibility of contacting **Marchesini** to obtain any information or to exercise your rights, we inform you that you can lodge a complaint before the competent independent administrative authority in the Member State of the European Union where you habitually reside, where you work, or where you believe an alleged violation has occurred of the law on the protection of your personal data. In Italy you can lodge a complaint with the Guarantor for the Protection of Personal Data (GPDP).

For information on how to submit your complaint to the Authority you can use the following contact details:

 **Guarantor for the protection of personal data**

Contact center: +39 06.696771

Email address: garante@gpdp.it

PEC address: protocol@pec.gpdp.it

Website: <https://www.garanteprivacy.it>

7.6. COMPENSATION (EX ART.82 GDPR)

We also remind you that anyone who suffers material or immaterial damage caused by a violation of Regulation 2016/679 has the right to obtain compensation for the damage from the data controller or data processor.

8. EXERCISE OF RIGHTS

To exercise your rights towards our Company, we recommend that you use the following form made available by the Guarantor Authority:

<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924>

In order to allow a rapid response to the request to exercise the rights, it is necessary that the interested party:

- indicate the exact date of the shooting;
- indicate the time or time frame as precisely as possible;
- provides other useful elements to identify him in the frames (e.g. type of vehicle, clothing, etc.).

The exercise of rights will only be permitted to interested parties identified in the recorded frames (or their delegates). If the images, for any reason, are not clear and/or it is not possible to identify the subject, such subject will not be considered "interested" pursuant to the Regulation precisely by virtue of the lack of the requirements established by art. 4.1 of the Regulation itself. However, a voluntary declaration by the interested party to identify himself as the unidentifiable subject of the video will be formalized and considered sufficient to allow the exercise of the rights provided for by the Regulation. The subject will assume civil and criminal liability for any false declarations made in this regard to the Data Controller.

9. FURTHER INFORMATION RELATED TO THIS PROCESSING

This information **MPAZ.IN.DPMS008** Revision 00 of **01/01/2024** is kept updated and available for consultation at the WEB address <https://marchesini.com/privacy>

The brief information indicated on the sign is also an integral part of this document.