

## PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA FOR VISITORS

*(Pursuant to Art. 13 of EU Regulation 2016/679 - "GDPR")*

### 1. Data Controller

The Data Controller is M.E.P. Macchine Elettroniche Piegatrici S.p.A. (hereinafter, "MEP" or the "Controller"), with registered office in Via Leonardo da Vinci 20, Reana del Rojale (UD), Italy.

### 2. Data Protection Officer (DPO)

The Controller has appointed a Data Protection Officer (DPO) in the person of Mr. Massimo Borgobello, Esq., who can be contacted for any matters concerning the processing of personal data at the following e-mail address: [gdpr@mepgroup.com](mailto:gdpr@mepgroup.com).

### 3. Categories of Data Processed

In order to allow access to and presence within the corporate facilities, the Controller processes the following personal data of the visitor:

- First and Last Name;
- Company or Organization represented;
- Identification document number.
- Video Surveillance (CCTV)

A video surveillance system is active exclusively in the external areas of the corporate perimeter. The system is operated solely for the necessity of protecting corporate assets and has been duly authorized by the competent authorities. The visitor's image may be captured solely during transit through these external areas.

### 4. Purposes and Legal Basis of the Processing

Personal data are processed for the following purposes:

- a) Access management: identification of the visitor, recording of entry/exit, and routing to the hosting corporate personnel.
- b) Corporate security and asset protection: ensuring security within the corporate premises, protecting corporate assets (including through the use of external CCTV), protecting know-how and trade secrets (also in relation to the signing of any Non-Disclosure Agreements/NDAs), and complying with obligations set forth by occupational health and safety regulations.

The legal basis for the processing is the legitimate interest of the Controller (Art. 6, par. 1, let. f of the GDPR) in ensuring the security of its facilities, personnel, and corporate information assets, as well as compliance with legal obligations concerning safety (Art. 6, par. 1, let. c of the GDPR).

### 5. Processing Methods and Retention Periods

The processing is carried out by expressly authorized internal personnel of MEP (e.g., reception staff, security personnel, corporate contacts for the visit), using paper and/or IT tools, with the adoption of appropriate security measures designed to prevent data loss, illicit use, or unauthorized access.

*Access Logs:* Attendance registers (paper or digital) and the related access/confidentiality declarations will be kept for a period not exceeding 12 months from the date of the visit.

*CCTV Images:* Images captured by the external video surveillance system are retained for a maximum period of 72 hours, after which they are automatically overwritten or deleted.

*Retention periods* may be extended solely if strictly necessary for the protection of the Controller's rights in judicial proceedings or upon explicit request by Public or Judicial Authorities (e.g., in the event of breaches of confidentiality agreements or accidents/unlawful acts occurring on the premises).

## 6. Recipients of the Data

Personal data will not be disseminated. They may be communicated, where strictly necessary for the indicated purposes, to:

- Public Security Authorities, Judicial Authorities, or control bodies, in the event of a specific request or legal obligation;
- Third-party companies or professionals providing IT support, legal advice, or security management services, designated as Data Processors (Art. 28 GDPR).

## 7. Data Subject's Rights

As a data subject, the visitor has the right (pursuant to Articles 15-22 of the GDPR) to ask the Controller for:

- Access to their personal data and to the information concerning the processing;
- Rectification or erasure of the same;
- Restriction of the processing or to object to the processing on grounds relating to their particular situation.

To exercise these rights, the data subject may send a written request to the DPO at the address:

[gdpr@mepgroup.com](mailto:gdpr@mepgroup.com)

The data subject also has the right to lodge a complaint with the Data Protection Authority (*Garante per la Protezione dei Dati Personali* - [www.garanteprivacy.it](http://www.garanteprivacy.it)) should they consider that the processing violates the provisions of the GDPR.