

## **EXTENDED INFORMATION NOTICE CONCERNING THE INSTALLATION OF A VIDEO SURVEILLANCE SYSTEM AT THE PERIMETER AND ACCESSES TO THE COMPANY PREMISES AND USE OF THE COLLECTED INFORMATION**

- Art. 13 of EU Regulation of the European Parliament and of the Council 679/2016 (“GDPR”);
- Legislative Decree no. 196/2003, as subsequently amended and supplemented;
- Art. 3.1 of the Decree of the Italian Data Protection Authority on video surveillance - 8 April 2010;
- Law No. 300 of 1970 (so-called. Workers’ Statute), art. 4 paragraphs 1 and 3;

### **1. Scope**

This information notice is provided pursuant to and for the purposes of art. 13 of the GDPR, art. 3.1 of the Decree of the Italian Data Protection Authority on video surveillance - 8 April 2010 (Video Surveillance Decree) for the purpose of informing its recipients that M.E.P. Macchine Elettroniche Piegatrici S.p.A. will put in place along the external perimeter of the company premises, and especially at the entry-exit gates, a video surveillance system active 24 hours a day, 365 days a year, in compliance with the above provisions and respecting the rights of Workers.

The aforementioned video surveillance system will be installed for the sole purposes of security and protection of company assets. The system’s cameras will under no circumstances film workstations or places reserved exclusively for Workers (changing rooms and toilets);

### **2. Simplified information notice pursuant to art. 3.1 of the Video Surveillance Decree**

The video surveillance zones will be marked with appropriate signs, in accordance with art. 3.1 of the Video Surveillance Decree, clearly visible in all ambient lighting conditions. Such signs are placed before the range of the cameras or, in any case, in their immediate vicinity.

### **3. Data Controller**

The Data Controller is M.E.P. Macchine Elettroniche Piegatrici S.p.A., with registered office in Reana del Rojale (UD), via Leonardo da Vinci no. 20, VAT no. and Tax Code 00162520308 (the “**Company**”), in the person of the legal representative *pro tempore* who may be contacted at the following:

- tel. 0432 851455
- fax 0432 880140
- e-mail address: info@mepgroup.com

The Data Protection Officer can be contacted at:

- gdpr@mepgroup.com

### **4. Data Processor**

The Processor of the personal data pursuant to art. 28 of the GDPR is the Company M.E.P. Macchine Elettroniche Piegatrici S.p.A., as identified above.

## 5. Purpose of the installation and of the subsequent processing of the collected information

The video surveillance systems were installed for the following purposes:

- a) security of the perimeter and accesses to the company premises;
- b) protection of the integrity of the company's assets and prevention of any acts of vandalism or damage;
- c) protection of the integrity of third-party assets temporarily stored within the company's premises.

The information collected by the video surveillance systems installed for the purposes set out above may also be used, pursuant to article 4, paragraph 3 of Law no. 300/1970, for purposes related to the employment relationship, in the event of violations and/or offences committed by employees.

## 6. Legal basis for processing

The video surveillance activity carried out is to be regarded as lawful since it is aimed at pursuing the legitimate interest of the legal person carrying it out (art. 6, par. 1, lett. f) of the GDPR), in which the purposes indicated in point 5 of this information notice must be included.

## 7. Recipients or categories of recipients of the personal data

The recipients (i.e. the natural or legal person, the public authority, the service or other body to which the personal data are disclosed) of the personal data acquired through video-surveillance systems are:

- the Company itself appointed as Data Processor,
- the employees and supervisors, expressly designated and authorised, both to access the premises where the control stations are located and to use the equipment and, in cases where it is indispensable for the purposes pursued, to view the images, who have been given specific instructions.

The processed data will not be disseminated and will not be disclosed to third parties, except to the Courts and the Judicial Police.

## 8. Types of personal data processed

The video surveillance systems record the audiovisual material on special storage media and may concern both common personal data and other categories of personal data referred to in articles 9 and 10 of the GDPR.

## 9. Transfer of data to a third country

Your data will not be transferred outside the European Union

## 10. Duration of image retention

The recorded images are retained and accessible by authorised persons, in full compliance with the provisions of the Video Surveillance Decree, for a period not exceeding 72 hours, without prejudice to special requirements for further retention in connection with Judicial Police investigations or requests by the Courts.

## 11. Operation of the video surveillance system and frequency of checks

The audiovisual footage taken by each camera forming part of the video surveillance system will be archived on digital media stored at the Company's Data Processing Centre, located at the registered office of M.E.P. Macchine Elettroniche Piegatrici S.p.A. in via Leonardo da Vinci, 20 - Reana del Rojale (UD)

These media will be protected and accessible only to expressly authorised company personnel.

For 365 days a year, 24 hours a day, the cameras of the video surveillance system will film the perimeter of the company premises and especially the entry-exit gates. Under no circumstances will they film workstations or places reserved exclusively for Workers (changing rooms and toilets).

## 12. Rights of the data subject

The persons to whom the personal data refer may at any time exercise their rights under articles 15-22 of the GDPR. Below are the rights you can exercise with regard to video surveillance:

- you have the right to ask the Data Controller for access to your personal data and information relating to them, the rectification of inaccurate data or the completion of incomplete data, the erasure of personal data relating to you (if one of the conditions indicated in art. 17, paragraph 1 of the GDPR are met and in compliance with the exceptions provided for in paragraph 3 of the same article, e.g. if your data are processed unlawfully), the restriction of the processing of your personal data (in the event of one of the hypotheses indicated in art. 18, paragraph 1 of the GDPR, e.g. if your data are processed unlawfully).
- you have the right to data portability in accordance with art. 20 of the GDPR.
- you have the right to object at any time to the processing of your personal data in the event of special situations concerning you.
- you have the right to lodge a complaint with a supervisory authority (Italian Data Protection Authority - [www.garanteprivacy.it](http://www.garanteprivacy.it)), and to appeal to the ordinary Courts.

The aforementioned rights are exercisable within the limits indicated in art. 3.5 of the Video Surveillance Decree.

In particular, with regard to the recorded images, the right to update, rectify or complete is not actually exercisable in view of the intrinsic nature of the data collected, since these are images collected in real time concerning an objective fact.

The rights may be exercised by contacting the Data Controller at the above-mentioned contact details.

## 13. Automated decision-making, including profiling

Your personal data will not be subject to any automated decision-making process, including profiling.

## 14. Update

This information notice may be supplemented with further indications, also in consideration of regulatory changes or decrees of the Italian Data Protection Authority.

Reana del Rojale, 08/06/2023