



In addition to the information provided to the interested parties by means of the signs displayed in the areas where video surveillance systems are in operation, it is communicated that:

- The processing of personal data through video surveillance systems takes place in accordance with current privacy regulations (EU Regulation 2016/679 "GDPR"; Legislative Decree 196/2003, as amended and supplemented by Legislative Decree 101/2018; General measures of the Guarantor Authority for the protection of personal data, expressly recognized by Art.22, paragraph 4 of Legislative Decree 101/2018)
- the registration of the images is carried out, as Data Controller, by **Vetzeria di Borgonovo Spa** in the person of the Legal Pro-Tempore Representative;
- the system is installed for SECURITY purposes and the use of cameras is aimed at protecting assets, persons and assets against possible intrusions, fires, thefts, robberies or acts of vandalism and the possible defense of the rights of the Owner in court (acquisition of evidence);
- access to or passage of the interested parties at the aforementioned entrances, rooms and spaces of relevance necessarily involves the shooting of images that may concern them;
- the detected images can be recorded and stored for the period of time strictly necessary to achieve the above purpose, and in any case for a time not exceeding the statutory deadlines (never exceeding 7 days), except for the longer period possibly necessary to comply with specific requests of the judicial authority or judicial police in relation to ongoing investigative activities; at the end of the expected retention period, the recorded images are deleted from their electronic, computer or magnetic media;
- the images can only be processed by formally authorized and educated personnel or by external companies that, as data controllers, collaborate in the maintenance of the plants and supervisory activities; they are not communicated in any way or disseminated outside the owner's structure, without prejudice to the execution of any orders of the judicial authority or judicial police or, in case of wrongdoing, the use in any judicial offices;
- the images will be treated with appropriate tools and methods to ensure an adequate level of security and confidentiality, with particular reference to the measures indicated by Art.32 of the GDPR and Provision on video surveillance - 8 April 2010 - Italian Privacy Guarantor;
- interested parties have the right to contact the Data Controller for any request for access to the videorecorded data concerning them, pursuant to Art.15 and below of the GDPR. In particular, the data subject, if it is in any case identifiable, has the right to obtain from the data controller confirmation of the existence or not of personal data concerning him, and their communication in an intelligible form; to know some news about their processing (origin of the data, purposes and methods of processing; identification details of the data controller and, if appointed, of the managers, etc.); to obtain the deletion or blocking of data processed in violation of the law; and to oppose, for legitimate reasons, the processing itself;
- The possible shooting of workers and use of video recorded images takes place in compliance with current regulations on labour law (Article 4 Law 300/70 "Workers' Statute", as amended by Article 23 of Legislative Decree 151/2015 "last implementing decree Jobs Act")

CONTACT DETAILS OF THE DATA CONTROLLER AND DATA PROTECTION OFFICER (IF ANY):

The Data Controller is the writing Organization, in person of the legal pro-tempore representative:

- **Vetzeria di Borgonovo Spa**
- Phone: 0523-865311 – E-mail: g.cerri@borgonovo.it

The Owner, pursuant to Art. 37-39 of the GDPR, has appointed a Data Protection Officer, to whom you can contact for any privacy information or to exercise privacy rights:

- **Galli Data Service Srl**



DATA CONTROLLER
Vetzeria di Borgonovo Spa
Via Aurelio Saffi, 34
20123 Milano (MI), Italy

DATA PROCESSING POLICY
FOR VIDEO SURVEILLANCE PURPOSES
REFERENCE LAW: Art.13 EU Regulation 2016/679
ID: VDS-4-Full disclosure

- Phone: 0523.1865049 – E-mail: dpo@gallidataservice.com