

Video surveillance privacy policy in accordance with article 13 of Regulation (EU) 679/2016 ("Regulation")

Pursuant to art. 13 of EU Regulation 679/2016 (hereinafter, "Regulation" or "GDPR"), we inform you that your personal data will be collected through the video surveillance system installed at the Company's headquarters, and will be processed by Engineering Ingegneria Informatica Spa (hereinafter, "Data Controller"), VAT No. 05724831002, based in Rome, Piazzale dell'Agricoltura, 24, as Joint Controller of the processing, with the other Companies belonging to the Group itself, which operate at the same company seat.

The Data Protection Officer (hereinafter, "DPO") pursuant to art. 37 et seq. of the Regulation can be reached at the registered office and at the following e-mail address: dpo.privacy@eng.it.

The system will operate 24 hours a day, 7 days a week, including holidays.

We would also like to inform you that the video surveillance systems installed at our premises may have one or more of the following characteristics:

- Closed-circuit system
- System able to carry out only filming without recording
- System able to also record the filming
- A system that is based on digital technologies that allow processing through a PC and transmission via a network.
- System connected to the anti-theft system, which therefore only comes into operation when the company is closed (in the absence of employees).

The characteristics of the installation are specified at the premises where it is located, in the brief privacy policy provided through the signs placed at our cameras, which complements the present privacy policy.

Categories and types of data processed

The data processed by the Data Controller and/or the Data Processor (if any) include your image, and may include, as a consequence of the video recording of your image, also your common data, such as: name, surname, sex, any other physical characteristics.

The aforementioned personal data subject to processing will be hereinafter jointly defined as "Personal Data".

Purpose and legal basis of the Personal Data processing

The data you provide will be processed for one or more of the following purposes:

- protection of the company's immovable and movable property
- safety and security of employees and third parties
- organizational and production requirements
- acquisition of evidence within the scope of defensive controls.

The specific purpose of the processing carried out in the location in which it is situated, are indicated in the *brief privacy policy*, as they may differ from one company seat to another.

The legal basis of the data processing is therefore found in art. 6.1.f) of the Regulation.

The references of the authorization of the DTL (Territorial Labour Directorate) of reference, or the agreement with the Labour Unions, in accordance with the provisions of the Statute of Workers (L. n. 300/1970, art. 4) are indicated in the brief privacy policy.

The provision of your Personal Data for these purposes is optional but your refusal will make it impossible to gain entry.

Personal data retention

The images acquired by the cameras are stored for 24 hours, unless otherwise specified in the *brief privacy policy*, and then automatically deleted. They may be stored for a longer period only in case of holidays or closure of offices or other activities, as well as in case of a specific investigative request by the Judicial Authority or the judicial police. In this case, the processing is necessary to comply with a legal obligation to which the Data Controller is subject, for which the legal basis of the same is found in art. 6.1.c) of the GDPR.

Processing methods

Your data are processed with the aid of electronic instruments, in compliance with the Regulation and the Provisions of the Supervisory Authority for the protection of personal data (Garante per la protezione dei dati) applicable, including in particular the Provision on video surveillance - April 8, 2010 ([Provvedimento in materia di videosorveglianza - 8 aprile 2010 \[1712680\] - Garante Privacy](#)) including the profiles of security and confidentiality, according to logic and procedures related to the aforementioned purposes.

The data collected through the video surveillance system will not be disseminated and will be stored in Italy.

Recipients

Your data may be accessed by the following subjects exclusively for the purposes described and in accordance with the rules laid down in the Regulation and the cited provision issued by the Supervisory Authority for the Protection of Personal Data (hereinafter "Garante Privacy"):

- 1) individuals who typically have the role of data processors pursuant to Article 28 of the GDPR, as further specified in the *short privacy policy*;
- 2) personnel in charge of the processing pursuant to Article 29 of the GDPR, i.e., persons appointed by the data controller and the data processor who are in charge of the maintenance services of the video recording systems, or, in general, of surveillance;
- 3) the data may be disclosed to the competent authorities (e.g. judicial and police authorities) who make a formal request; in this case, the disclosure of data is necessary to fulfil a legal obligation to which the data controller is subject. The legal basis for such processing is art. 6.1.c) of the GDPR.

The updated and complete list of Data Processors is available at the Data Controller's headquarters at the addresses indicated above, or, where operational, at the Secretariat Office of the seat in which it is located.

Your rights

You have the right to access your data at any time, pursuant to Articles 15-22 GDPR. In particular, you may request the rectification, erasure, restriction of the processing of such data in the cases provided for by art. 18 of the GDPR, the revocation of consent, to obtain the portability of data concerning you in the cases provided for by art. 20 of the GDPR, and to lodge a complaint with the competent supervisory authority under Article 77 of the GDPR (Garante per la Protezione dei Dati Personali).

However, dealing with data processed through the video surveillance system, it should be noted that the right of rectification and integration is not actually exercisable in view of the intrinsic nature of the data collected, as these are images collected in real-time concerning an objective fact.

You have a right to formulate a request in which you object to the processing of your personal data pursuant to Article 21 of the GDPR and in which you provide information about the reasons that justify the opposition. The Data Controller reserves the right to evaluate your request, which may not be accepted in case of the existence of compelling legitimate reasons to proceed with the processing that prevail over your interests, rights and freedoms. The request must be addressed in writing to the Data Controller, or the DPO, at the addresses indicated above.