

# INFORMATION VIDEO SURVEILLANCE SYSTEM

In accordance with article 13 of Regulation 679/2016 regarding the protection of personal data and in compliance with the provision of the Data Protection Authority regarding video surveillance of 8th April, we are responsible for providing you with some information relating to the treatment of your personal data in the context of video surveillance processing.

In compliance with current legislation, specific signboards briefly inform interested parties that are about to access or that are in the video-monitored area: this information therefore constitutes a supplement to this "simplified" information.

#### **Data controller**

The Data Controller is "SDAG SpA a Socio Unico", headquartered at Stazione Confinaria S. Andrea, 34170 Gorizia (GO). The contact details of the Data Controller can be easily found on the company website www.sdag.it. The Data Controller has appointed a Data Protection Officer (DPO) who can be contacted by email at dpo@sdag.it

# Type of data collected and purpose of processing

The Data Controller informs you that a video surveillance system with image recording is active in the SDAG areas, which, like the name and biographical data, represent personal data. The processing of personal data acquired through video surveillance as just specified is necessary to guarantee the safety of the people who carry out their duties at the SDAG, for the protection of the assets and integrity of the company structure and the assets stored there on behalf of third parties, as an aid to all operational activities as well as to protect public safety and the prevention and detection of crimes.

However, existing systems and equipment will not cover areas located inside the buildings or places reserved exclusively for employees. For a more precise identification of the location of the cameras, please refer to the plan available from the SDAG Technical Office.

### Legal basis of processing

The legal basis of this processing is constituted by the legitimate interest of the Data Controller (art. 6 par. 1 letter f) of the GDPR) as well as the fulfillment of a contractual obligation to which the Data Controller is subject (art. 6 par 1 letter c) of the GDPR) and is the subject of an agreement between the employers and unions pursuant to art. 4 of law 300/1970.

#### **Data retention**

The system will operate 24 hours a day, seven days a week (including public holidays) and recordings will be automatically deleted after 7 days.

The images may be kept for longer in the event of holidays or closure of offices or businesses as well as if a specific request from the Judicial Authority or the judicial police must be complied with.

#### Distribution of data to third parties

For the aforementioned purposes only, the images, even in real time, may be viewed, through dedicated monitors, by personnel expressly authorized to process them, who have received adequate operating instructions in this regard.

The data may also be processed on behalf of the Data Controller also by subjects designated for this purpose as external data processing managers pursuant to art. 28 GDPR, such as, by way of example,



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companies that deal with control and surveillance services, companies that deal with maintenance of the video surveillance system, etc.

The data will not be transferred to third parties, except in the cases provided for by current legislation, requests from judicial authorities, defensive investigations or to assert a right in court.

In any case, the personal data of the interested party are not subject to dissemination nor is any transfer of the data to non-EU countries or to International Organizations.

# Rights of the interested party

We inform you that you can exercise the rights provided by the articles 15, 16 17, 18, and 21 Regulation 679/2016 by directly contacting the Data Controller or the DPO, and by filling the forms available on the page dedicated to Privacy of the SDAG institutional website (https://www. sdag.it/it/privacy); in the same section you will find further useful information on the processing of your data.

The exercise of the aforementioned rights is subject to the limits, rules and procedures established by European Regulation 679/16 that the interested party must know and implement. Furthermore, in accordance with the provisions of article 12 paragraph 3, the Data Controller will provide the interested party with information relating to the action taken without unjustified delay and, in any case, at the latest within 30 days of receiving the request. This deadline may be extended by 60 days, if necessary, considering the complexity and number of requests. The Data Controller informs the interested party of this extension, and of the reasons for the delay, within 30 days of receiving the request.