

# Information on the processing of video surveillance images upon articles. 13 and 14 of the EU Regulation 679/2016 (GDPR)

LOMBARDINI SrI wishes to inform you that the European Regulation n. 679/2016 provides for the protection of natural persons with regard to the processing of personal data.

### Data Controller and Contact Details

The data controller company is LOMBARDINI S.r.l., with registered office in Reggio Emilia - Via Cav. Del Lavoro A. Lombardini n. 2, VAT number/Tax Code 02962900359.

The data controller company can be contacted at the following address: ammdel@pec-lombardini.it.

### Data Protection Officer

The role of Data Protection Officer within this organization (Data Protection Officer - DPO) is not foreseen as it is not mandatory under the GDPR.

#### Finalità del Trattamento

The Data Controller, in compliance with current legislation on privacy and according to the indications provided by the Italian Data protection Authority (provision regarding video surveillance - 04/08/2010), has installed systems of video surveillance and video recording consisting of closed circuit cameras. The systems are installed on the external perimeter and inside the company premises.

This activity involves the collection and storage of video information on all people who enter the monitored space, identifiable based on their appearance or other specific elements. The identity of such persons can be established on the basis of the information thus collected. The acquisition of footage responds to the following purposes:

- Protection needs of individuals, also achieved by avoiding entry of unauthorized people;
- Protection needs for company assets, with respect to possible intrusions, thefts, robberies, damages, vandalism;
- Collection and acquisition of evidence.

### Legal basis of the data processing

With reference to the lawfulness of the processing, it is specified that the legal bases on which the processing of personal data referred to in this information is based consist of:

• As for the purposes referred to in paragraph named "purposes of the data processing" of this information, the processing is based on the legitimate interest of the Controller in protection the safety of people and the assets and in the acquisition of evidence).

### Data processing methods

The processing of your personal data is carried out by means of the operations indicated in the art. 4 no. 2) GDPR and precisely: collection, recording, organization, conservation, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data.

Your personal data is subjected to both paper and electronic and/or automated processing.

The data provided will be processed, as well as manually, with the aid of suitable electronic and IT tools and software platforms, equipped with tools capable of guaranteeing their security and confidentiality, in compliance with logic strictly related to the purposes themselves, the modification or unauthorized destruction, always in compliance with logic strictly related to the purposes themselves.





## Data retention time

Your personal data will be stored by the Data Controller for a period not exceeding 24 hours, in compliance with the provisions of the art. 3.4 of the Italian Data Protection Authority - provision of 04/08/2010. The term may be extended to 7 days if there are particular needs for further conservation in relation to holidays and suspension of activity. In the event that it is necessary to comply with a specific investigative request from the judicial authority or judicial police, the retention terms may be deferred until the end of the proceedings.

### Data retention time

Your personal data will be retained for the duration of 3 years from the contact.

In case of contracting, your data will be retained for the period provided in the information applicable.

## **Data Communication and dissemination**

Your data will be processed by internal staff expressly authorized and trained by the Data Controller, as well as by the external company providing security services, appointed as Data Processor.

The images taken are recorded on digital media and will not be disseminated.

If expressly requested, the images may be provided to the Judicial Authority and members of the Police Force.

Under no circumstances will your data be disclosed.

### <u>Transfer of data outside the European Economic Area</u>

Your personal data won't be transferred outside the European Economic Area.

### Automated decision making

Your data will not be included in any automated decision-making process.

### Rights of the interested party

- right to ask the Data Controller company for access to personal data, rectification and/or cancellation of the same and/or limitation of the processing concerning it and/or opposition to the processing;
- right to file in Italy a complaint with the Privacy Authority for the protection of personal data, following the procedures and indications published on the Authority's official website at www.garanteprivacy.it;
- right to file a complaint with another competent European privacy authority located in the place of habitual residence or domicile in Europe of anyone who disputes a violation of their rights, following the appropriate procedures and indications;
- right to portability of personal data; this right allows the interested party to receive personal data concerning him or her in a structured format, commonly used and readable by an automatic device, and - under certain conditions - to transmit them to another data controller without impediments;
- right not to be subjected to automated decisions, including profiling: the interested party has the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or which significantly affects his rights and freedoms;
- right to withdraw consent, if the processing is based on consent.



All the aforementioned rights can be exercised by the interested party by writing to the PEC address of the Data Controller company and providing an identity document of the legitimized applicant.