



Data Protection Management System

Doc. **INF-DPMS.04** Rev. **02** of **20/12/2022**
Classification: **L1 – PUBBLICO**

VIDEOSURVEILLANCE INFORMATION

Made in accordance with Articles 12, 13 and 14 of Regulation (EU) 2016/679

F.Ili Gancia & C. S.p.A.

Legal and operational headquarters: C.so Libertà, 66 – Canelli 14053 (AT)

VAT No. F/Company Register: IT 00619260052, docId:18D7C9449E3E8F0D905AE194825364E4 - REA Code: AT - 58097

PEC: amministrazione@gancia.postecert.it

Phone +39 0141 8301

e-mail: dataprotection@gancia.it



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1 RECIPIENTS OF THE DOCUMENT

This document is addressed to individuals who, for whatever reason, intend to or are required to gain access to the area under video surveillance. Such individuals are considered data subjects under Article 4 of the Regulations.

Minors: In case you are a minor, such as a student included in an Alternanza Scuola Lavoro (D. Lgs.77/2005) program, please contact your company manager in order to better understand the contents of this document.

2 FOREWORD

In compliance with the guidance provided by **Regulation (EU) 2016/ 679** (hereinafter, "**Regulation**" or "**GDPR**") on the processing and free movement of personal data, you have the right to know all information regarding the processing of your personal data in a clear and transparent manner. Therefore, in compliance with this principle, we hereby intend to inform you about the processing of your personal data related to the video surveillance system, also reporting the provisions of Article 13 of the Regulation.

This notice complements the short notice issued through the appropriate signage placed on the perimeter of the video surveillance area.

3 DEFINITIONS

Definitions of terms used in this policy, are to be understood as per Article 4 of the [EU Regulation 2016/679](#).

4 OWNER OF THE PROCESSING OF YOUR PERSONAL DATA

F.Ili Gancia & C. S.p.A. (hereinafter simply **F.Ili Gancia & C.**) is the Data Controller of your personal data, acquired and processed through the video surveillance system, pursuant to the Regulations.

Below is the contact information:



F.Ili Gancia & C. S.p.A.

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Phone +39 0141 8301

e-mail: dataprotection@gancia.it

Data Protection Officer (DPO): dpo@gancia.it

4.1 DATA PROTECTION OFFICER - DPO

F.Ili Gancia & C. although not required to appoint a DPO under Article 37 of the GDPR, but considering the protection of personal data to be of primary importance, has nevertheless decided to appoint a Data Protection Officer, who can be contacted at the following e-mail address: dpo@gancia.it

4.2 DATA PROTECTION COORDINATOR

F.Ili Gancia & C., also pursuant to Article 2-quaterdecies of Legislative Decree 196/2003 (so-called "Privacy Code"), has taken steps to appoint a company **Data Protection Coordinator with the** task of supervising the compliance of processing with the GDPR.

The Data Protection Coordinator is at your disposal for any clarification or information regarding the processing of your personal data and to facilitate you in the possible exercise of your rights under the Regulations.

You may contact the Data Protection Coordinator at the following e-mail address: dataprotection@gancia.it

5 OUR CORPORATE POLICY ON THE PROTECTION OF PERSONAL DATA

F.Ili Gancia & C., has always been very attentive to the security of the information it manages, with particular regard to information that may contain personal data (ex art 4.1 GDPR) or special categories of personal data (ex art. 9 GDPR). For this reason, the company has decided to adopt a single organizational model, called **Data Protection Management System** (hereinafter "**DPMS**" or "**System**"), also based on the guidelines of ISO 27001 standards. Taking into account the context of our organization, supply chain requirements and stakeholder expectations, the System, establishes Leadership and commitment of the Data Controller, through the definition of organizational roles, internal and external responsibilities and authority of those involved. Within the DPMS, security objectives are identified and the actions necessary to achieve them

are planned. The necessary resources and expertise are also ensured in order to constantly and continuously improve the System over time, periodically verifying its scope and alignment with corporate purposes.


6 INFORMATION TO WORKERS

This facility is authorized under Article 4 of Law 300/1970 (the so-called "*Workers' Statute*") through a special union agreement signed between the parties on May 3, 2019.


7 TREATMENT OF VIDEO SURVEILLANCE

The data subject has the right to know the purpose of the video footage, the legal basis that makes the processing lawful, the manner of processing, who can access the recorded data, and the storage period of the images.


Why do we do this?

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|  <p>Registration 24 hours a day 7 days a week</p> | <p>Purpose We use the Video Surveillance system in order to improve the safety of workers, protect our corporate and personal assets and the property of third parties who for whatever reason are inside our company. Registration is carried out continuously, that is, 24/7. This is necessary in order to verify, even during business hours, any unauthorized access, any damage or theft suffered or damage caused by third-party vehicles maneuvering in our yards.</p> |
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What is the legal basis for processing?

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|  <p>Legitimate Interest Art. 6.1 lett. f GDPR</p> | <p>We believe it is our legitimate interest to ensure the safety of our workers, the protection of our corporate and personal assets, and the property of third parties who visit our company. You have the right to object to the processing but we may still continue to process your personal data if there are compelling legitimate grounds for processing that outweigh your interests, rights and freedoms or when it is necessary for the establishment, exercise or defense of a legal claim.</p> |
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What are the criteria for preservation?

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|  <p>Conservation 48 hours</p> | <p>Retention is limited to 48 hours following the recording, subject to special requirements for further retention in connection with holidays or closure of our offices as well as in case we need to adhere to a specific investigative request of the judicial authority or judicial police. Access to the recorded images will be made exclusively to verify specific incidents of violation or suspected violation of our rights to protect the safety of workers, property and assets of third parties. When the 48 hours expires, images are automatically deleted or overwritten by the recording system.</p> |
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Is the data transferred abroad?

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|  | <p>The data subject has the right to know whether his or her data are disclosed to recipients in third countries outside the European Economic Area or to international organizations. For the purposes listed in this policy, personal data is not transferred abroad.</p> |
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More information about the treatment



Personal Data
Art. 4.1 GDPR

What kind of personal data do we process?

The video surveillance system processes only video images and individual stills of data subjects who gain access to the controlled area or face the perimeter fence or gates. Such frames are considered personal data in accordance with Article 4.1 of the Regulations.

How do we process personal data?

Personal data are acquired by means of appropriately and regularly installed cameras in compliance with current regulations. The acquired data are recorded in on special recorder and appropriate technical and organizational measures have been taken in order to protect their integrity and confidentiality (unauthorized access). Perimeter camera data could be viewed in LIVE mode in order to monitor driveway or pedestrian access and damage caused by vehicles maneuvering in yards.

Can the data subject refuse to give the data?

The provision of data occurs automatically with entry into the area under video surveillance. Sometimes the data subject is forced into such entry to fulfill contractual obligations (e.g., employees going to work, contractors, couriers, external technicians, supervisory bodies, etc.) and is not free to make a voluntary choice.

What happens if you refuse?

The data subject may be in breach of his or her contractual obligations with the Controller or Third Parties.

In the limited cases where the data subject is free to decide whether or not to make access to the video surveillance area, (e.g., guest), failure to do so will not allow him or her to take advantage of all the opportunities we offer and related to those areas.

Who can access personal data?



The data subject has the right to know the recipients or categories of recipients to whom personal data have been or will be communicated

Personal data acquired by the video surveillance system will be accessible to the following parties:

- a. Our employees and collaborators in their capacity as **Authorized Processors.**
- b. Companies/professional firms that provide assistance and/or consulting services to the Owner (e.g., in legal matters), as well as third-party service providers.
Said individuals will process the data in their capacity as **Data Processors.**
- c. We may also disclose data to administrative, institutional and/or judicial authorities and any other entity to which disclosure is required by law and/or for the fulfillment of the purposes set forth in this policy.
Said parties will process the data in their capacity as autonomous **Data Controllers.**

The full list of recipients of personal data is available from the Owner.

Attention!!! Under no circumstances will the data be disseminated.

Who can identify the subjects filmed?



The data subject may be identified

Without prejudice to the data subject's right to voluntarily identify himself or herself in the filmed subject, in the event of a dispute or crime, the filmed subjects will be identified by the competent authority following a complaint. In compliance with any relevant laws in force, the Data Controller will make available to the authority all necessary information in its possession in order to identify the filmed subject more quickly.



8 ADDITIONAL RIGHTS

Without prejudice to what is highlighted in the previous points, taking into account the type of processing and with reference to the legal basis adopted by the Data Controller, the data subject is granted the following additional rights:

8.1 ACCESS (EX ART.15 GDPR)

The right to obtain confirmation as to whether or not we are processing personal data concerning him or her, and if so, to obtain access to the personal data processed.

The right to obtain a copy of the processed data in electronic format. This right is applicable only if it does not lead to infringement of the rights and freedoms of others, such as, for example, the presence of other identifiable individuals in the images and the lack of the possibility to anonymize them in a safe and cost-effective manner through deletion or masking of the parts of the frames that depict them. On this point, it should be noted that in case further copies are requested after the first one, a fee based on our administrative costs may be charged.

8.2 CANCELLATION (EX ART.17 GDPR)

The right to obtain the deletion of personal data concerning him/her without undue delay if any of the following reasons exist:

- a) personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed (see retention criteria in Section 9);
- b) the data subject has withdrawn the consent on which the processing is based and there is no other legal basis for the processing (not applicable);
- c) the data subject objects to the processing and there is no overriding legitimate reason for processing;
- d) personal data have been unlawfully processed;
- e) personal data must be deleted to fulfill a legal obligation to which our Company is subject.

8.3 LIMITATION (EX ART.18 GDPR)

The right to obtain restriction of processing when one of the following occurs:

- a) The data subject disputes the accuracy of the personal data. The restriction will be applied for the period necessary to allow us to verify the accuracy of such personal data;
- b) processing is unlawful and the data subject objects to the deletion of personal data and instead requests that their use be restricted;
- c) although we no longer need it for processing purposes, personal data are necessary for the data subject to establish, exercise or defend a right in court;
- d) the data subject has objected to the processing, pending verification as to whether the data controller's legitimate reasons prevail over those of the data subject.

8.4 NOTIFICATION (EX ART.19 GDPR)

The right to obtain from our Company direct communication to each of the recipients to whom personal data have been transmitted by us regarding requests for deletion or restriction of processing, unless this proves impossible or involves a disproportionate effort. In addition, should he or she deem it appropriate, the data subject the right to obtain from our Company a list of the recipients of his or her data.

8.5 COMPLAINT (EX ART.77 GDPR)

Without prejudice to the possibility of turning to **F.lli Gancia & C.** to obtain any information or to exercise your rights, we inform you that you may lodge a complaint before the competent independent administrative authority in the Member State of the European Union where you normally reside, where you work, or where you believe an alleged violation of the law on the protection of your personal data has occurred. In the Italian territory, you may file a complaint with the Garante per la Protezione dei Dati Personali (GPDP).

For information on how to file your complaint with the Authority, you can use the following contact information:



Data Protection Authority

Switchboard: +39 06.696771

E-mail address: garante@gpdp.it

PEC address: protocollo@pec.gpdp.it

Web site: <https://www.garanteprivacy.it>

8.6 COMPENSATION (EX ART.82 GDPR)

We would also like to remind you that anyone who suffers tangible or intangible damage caused by a violation of Regulation 2016/679 has the right to obtain compensation from the data controller or processor.

9 EXERCISE OF RIGHTS



To exercise your rights towards our Company, we advise you to use the following form made available by the Guarantor Authority:

<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924>

In order to enable prompt response to the request to exercise rights, it is necessary for the data subject:

- State the exact date of the shooting;
- state as precisely as possible the time or time frame;
- provide other useful elements to identify him in the frames (e.g., type of vehicle, clothing, etc.).

The exercise of rights will be allowed only to the subjects identified in the recorded frames (or their proxies). If the images, for whatever reason, are not sharp and/or and it is not possible to identify the subject, that subject will not be considered an "interested party" within the meaning of the Regulations precisely by virtue of the lack of the requirements provided for in art. 4.1 of the Regulations. However, a voluntary declaration by the data subject to identify himself/herself in the unidentifiable subject of the video will be formalized and deemed sufficient to allow the exercise of the rights provided by the Regulations. The subject will assume civil and criminal liability for any false statements made in this regard to the Data Controller.

10 ADDITIONAL DISCLOSURES RELATED TO THIS TREATMENT

This informative **INF-DPMS-04** Revision **02** of **20/12/2022** is kept up-to-date and available for reference at the WEB address www.gancia.it/infovideo

The following short information (warning sign) **INF-DPMS-04A** is also an integral part of this document:



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Attenzione!

VIDEOSORVEGLIANZA

EFFETTUATA SULLA BASE DEL LEGITTIMO INTERESSE
DI TUTELARE I PROPRI DIPENDENTI,
IL PROPRIO PATRIMONIO AZIENDALE ED I BENI DI TERZI

| | |
|---|---|
|  <p>Titolare del Trattamento: F.LLI Gancia & C. SpA Corso Libertà 66, Canelli (AT) (Italy) Tel +39 0141 8301 - mail: infoedatabreach@gancia.it</p> | <p>Responsabile Protezione Dati: La società ritenendo di primaria importanza la tutela dei dati personali, ha nominato un Data Protection Officer (DPO) contattabile al seguente indirizzo: dpo@gancia.it</p> |
|---|---|

Diritti del soggetto interessato:
Il soggetto interessato, ha il diritto di richiedere l'accesso o la cancellazione dei suoi dati personali nelle modalità previste dal Regolamento (UE) 679/2016. Al fine dell'esercizio dei diritti, si tenga presente che le immagini, pur essendo registrate 24 ore al giorno 7 giorni su 7, sono conservate per un periodo massimo di **48 ore** dalla loro acquisizione.

Maggiori informazioni:
Si possono ottenere maggiori informazioni sui diritti dell'interessato, sulle modalità di esercizio e più in generale su questa Videosorveglianza, richiedendo l'apposita informativa estesa alla reception aziendale durante l'orario di apertura degli uffici. In alternativa è possibile raggiungere facilmente le medesime informazioni via Web attraverso il QR Code qui a lato o digitando il seguente URL: www.gancia.it/infovideo



Scan me

INFORMATIVA BREVE AI SENSI DELL'ART. 13 DEL REGOLAMENTO (UE) 2016/679

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