

GDPR00017EN Rev. 2 del 2020-10-15

INFORMATION NOTICE ON PERSONAL DATA PROCESSING (PRIVACY)

Video surveillance

(Article 13-14 European Privacy Regulation 679/2016)

Dear Mr. /Ms.

in compliance with art. 13 of the EU Reg. N. 679/2016 on the Privacy and Personal Data protection, with reference to the video surveillance system in the Company and with reference to purposes of collection and processing of personal data concerning you, ASK INDUSTRIES S.p.A., informs you of the following.

The processing of personal data acquired through the video surveillance system will be based on the principles of lawfulness, fairness and transparency, as well as respectful of your privacy and your rights.

DATA CONTROLLER:

ASK INDUSTRIES S.p.A., with Headquarters in Monte San Vito (AN) Via dell'Industria n. 12-14-16, P.I. 00091200428, PEC: askindustries@pec.it, tel. 07174521, fax 0717452400

DATA PROTECTION OFFICER

Contact details: dpo_it@askgroup.it

DATA SUBJECT TO PROCESSING

We inform you that subject to processing will be the images acquired through the video surveillance system.

PURPOSE OF THE PROCESSING

ASK Industries S.p.A uses a video surveillance system for accesses to the company only to ensure safety on the work place, corporate assets security, to guarantee organizational and production needs and to prevent illegal acts.

The video surveillance systems are only in the proximity of production areas accesses and are active day and night.

 Registered Office and Administrative Headquarters

 Via dell'Industria 12/14/76

 60037 Monte San Vito (AN) - Italy

 P +39 07174521

 F +39 0522 1820 186

Other offices Viale Ramazzini 39/F 42124 Reggio nell'Emilia (RE) - Italia Telefono: +39 0522 500900 Fax:+39 0522 1820 (142)-(143)-(144) Legal codes R.E.A. di Ancona n. 59351 R.I. di Ancona e Cod.Fisc.: 00091200428 Partita IVA: IT 00091200428 Capitale Sociale: Euro 13.000.000 i.v.



For third party rights privacy, the visual angle is limited to the area to surveil so as to avoid, as far as possible, videotaping of surrounding places and details that are not relevant for the above mentioned purposes.

The images in no way will be disseminated externally, except for the need of timely delivery to the competent Judicial Authority in the event of a criminal offense.

The images are recorded and stored exclusively by the security personnel and are deleted no later than 7 days.

The images can be consulted only by the personnel in charge or by the judicial or police authorities.

PROCESSING METHODS

We inform you that the data will be processed through the use of electronic means, that the processing will include, in compliance with the law provisions and the precautions needed to ensure data security, all operations or set of operations provided for by art. 4 paragraph 1 n. 2 of EU Reg. 679/2016 necessary for the processing in question, namely:

collection, recording, organization, structuring, conservation, adaptation or modification, extraction, consultation, use, communication by transmission, comparison or interconnection, limitation, cancellation or destruction.

The data will be processed both through manual and computer systems and stored in digital form. The digital database will be organized so that access to the data will be allowed only to the personnel expressly appointed by the Data Controller. The operations to modify the data contained in the database will be allowed only to the database

controller and data processors, the personnel expressly in charge of the processing.

The processing operations will be performed so that to guarantee the logical, physical security and confidentiality of your personal data.

The data may be communicated, upon request, to the parties indicated below, to the judicial and police authorities.

We inform you that your personal data will not be disseminated, i.e. they will not be disclosed to unspecified parties in any way, even by making them available or allowing their consultation.

LEGAL BASIS OF PROCESSING

The processing of your personal data finds its justification in:

legal regulations

PROCESSING NECESSARY TO PURSUE THE LEGITIMATE INTERESTS OF THE

DATA CONTROLLER OR OF THIRD PARTIES (ARTICLE 6 PARAGRAPH 1 LECT F):

To prevent the committing of crimes at the workplace, for security purposes and corporate assets protection, it is necessary to process your personal data to pursue the above mentioned legitimate



interests of the Data Controller or third parties, unless, in specific cases, the interests or the fundamental rights and freedom of the interested party do not prevail.

DATA RECIPIENTS OR CATEGORIES OF DATA RECIPIENTS

In the management of data, acquired through video surveillance systems, the following categories of persons in charge and / or internal and external managers, who have been given specific written instructions, may learn about them:

-employees;

-owners and employees of the company responsible for the maintenance of the video surveillance system, as external technicians or managers;

-professionals or service companies operating on behalf of our company

WILL DATA BE TRANSFERRED TO EXTRA-EUCOUNTRIES OR INTERNATIONAL ORGANIZATIONS?

Your data will not be transferred outside of ASK Industries S.p.A. Italy.

HOW LONG WILL YOUR PERSONAL DATA BE SAVED?

The data will be saved for seven days.

In case of Holidays or bank holidays, as well as in cases where it is necessary to comply with a specific inquiry by the judicial or police authorities, data storage will be extended.

However, with exception made for instances of request made by the judicial or police authorities, the data will not be stored for more than a week.

WHICH RIGHTS DOES THE INTERESTED PARTY /DATA SUBJECT HAVE?

Granting your consent to the processing of personal data does not eliminate the rights recognized to you by law.

The forms to exercise your rights can be obtained by calling +39 071 74521.

In particular, you have

- Right of access (Article 15 of EU Reg. 679/2016):

it is the right to obtain from the Data Controller confirmation of whether or not processing of personal data concerning you is taking place and, in the event it is, to obtain access to your personal data and the following information: a) the purposes of the processing; b) the categories of personal data in question; c) the recipients or categories of recipients to whom the personal data have been or will be communicated, in particular whether the recipients are non-EU Countries or international organizations; (d) where feasible, the retention period of the personal data provided or, if not feasible, the criteria used to determine this period; e) the existence of the right of the interested party to request the Data Controller to rectify or delete personal data or limit the processing of personal data concerning them or to oppose their processing; f) the right to lodge a complaint with a Supervisory Authority; g) if the data were not collected from the Data Subject, all information available on their origin; (h) the existence of an automated decision-making process, including the profiling referred to in Article 22 (1) and (4) and, at

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least in such instances, significant information on the logic used, and the importance and expected consequences of such processing for the interested party.

-<u>Right of rectification</u> (Article 16 of EU Reg. 679/2016): it is the right to obtain from the Data Controller correction of inaccurate personal data concerning you without unjustified delay, as well as integration of incomplete personal data, also by providing an additional declaration.

- <u>Right of cancellation (Article 17 of EU Reg. 679/2016)</u>: it is the right to obtain from the Data Controller deletion of personal data concerning you without undue delay if certain requirements are met.

- <u>Right to limit the processing</u> (Article 18 EU Reg. 679/2016): it is the right to obtain from the Data Controller limitation of processing when one of the hypotheses provided for by art. 18 of the EU Reg. 679/16 applies.

- <u>Right to object to the processing</u> (Article 21 EU Reg. 679/2016): it is the right to object at any time, for reasons connected with your specific situation, to the processing of personal data concerning you. In this case, the Data Controller refrains from further processing your personal data unless the same Data Controller demonstrates either the

existence of binding legitimate reasons to proceed with the processing that prevail over the interests, rights and freedom of the interested party or in order to assess, exercise or defend a right in court.

<u>- Right to data portability</u> (Article 20 of the EU Reg. 679/2016): it is the right to receive personal data concerning you in a structured, commonly used and automatically readable format as well as the right to transfer those data to another Data Controller, without impediments by the Data Controller to whom the Data subject has provided them, if: a)

the processing is based on consent, or on a contract; b) the processing is carried out through automated means.

- <u>Right to propose a complaint to the authority</u> (Privacy Authority): Pursuant to art. 77 Reg. UE 379/16 you, without prejudice to any other administrative or judicial appeal, can lodge a complaint with the Privacy Guarantor if you believe that the processing that concerns you is in breach of EU Regulation 679/16.