Information Notice for Third Parties - VIDEO SURVEILLANCE pursuant to Art. 13 EU Reg. 679/2016 concerning images captured by the company video surveillance system

Data subjects: third parties

Dear Sir/Madam,

NEWMED CONSULTING S.A.S. DI MARIKA ORTOLANI & C, with registered office in Soliera (MO), Stradello Morello n. 143, CAP 41019, and with operational office in Soliera (MO), Via Garibaldi n. 40, CAP 41019, REA number – MO 427851, VAT number IT03910930365, Tel +393395981944, Mail privacy@newmedconsulting.com, PEC newmedconsulting@pec.it, as the data controller, wishes to inform you that EU Reg. 679/2016 and the current national legislation on the protection of personal data provide for the protection of natural persons with regard to the processing of personal data. According to this legislation, the processing of your personal data will be based on the principles of correctness, lawfulness and transparency, protecting your privacy and your rights. Pursuant to the aforementioned art. 13 of EU Reg. 679/2016 – GDPR and pursuant to the specific regulatory interventions issued by the competent bodies and the competent Supervisory Authority, we therefore provide you with the following information:

a) For the purpose of protecting company assets, the data controller has installed a closed circuit video surveillance system at the company headquarters located in Soliera (MO), via Giuseppe Garibaldi, 40, connected via the Internet to a remote location from which it will be possible to view recorded images and images in real time. Viewing images in real time is permitted only outside of working hours and only in exceptional cases. All installed cameras are indicated by special information signs, which are placed before the camera's range of action, even in their immediate vicinity; the information signs have a format and position such as to be clearly visible in all ambient lighting conditions and include a symbol of explicit and immediate understanding. The video surveillance system, as well as the accessories for its operation, are kept, in such a way as to guarantee their safety, in places with restricted and controlled access.

b) We inform you that the collection of images may take place without the consent of the interested party, as it is carried out with the intent to pursue a legitimate interest of the owner (art. 6, paragraph 1, letter f) of EU Reg. 679/2016), for the purpose of protecting company assets. This situation is confirmed by the "Provvedimento in materia di videosorveglianza - 8 aprile 2010", within the scope of the so-called "Balancing of Interests" (paragraph 6.2 of the "Provvedimento in materia di videosorveglianza - 8 aprile 2010"), as well as by the most recent interventions of the competent Authorities (EDPB Guidelines 3/2019 on the processing of personal data through video devices, Version 2.0, Adopted on 29 January 2020; answers to the most frequently asked questions (FAQ) on video surveillance and personal data protection by the Guarantor for the protection of personal data - December 2020). The provision of data is, therefore, strictly necessary in relation to the purposes referred to in letter a) of this information notice.

c) Your personal data (images) will be processed by persons specifically appointed by the data controller as data processors (if present and specifically appointed) and/or by anyone acting under the authority of the controller and who has access to personal data; these persons will process your data only when necessary in relation to the purposes of the provision and only within the scope of carrying out the tasks assigned to them by the data controller, undertaking to process only the data necessary for carrying out such tasks and to perform only the operations necessary for carrying out the same. Furthermore, the images taken and/or recorded may be communicated, only, when necessary, to:
   - Judicial police;
   - Judicial authority.

   Your personal data will not be disclosed.

d) The images will be retained for a maximum of twenty-four (24) hours after their acquisition, for specifically motivated needs, except for closing days/holidays or express requests from the competent authorities. The images will be processed by the data controller in full compliance with the principles of correctness, lawfulness, transparency and protection of confidentiality, with logic strictly related to the purposes indicated in this information and will be retained in a form that allows the identification of the interested party for a period of time not exceeding that necessary for the purposes for which they were collected or subsequently processed.

   You may, at any time, exercise the following rights provided for by EU Reg. 679/2016 against the data controller, by contacting the data controller at the contact details indicated in point a) of this information notice:
   - Right of access by the data subject (Art. 15 of EU Reg. 679/2016).
   - Right to rectification (Art. 16 of EU Reg. 679/2016).
   - Right to erasure – "right to be forgotten" (Art. 17 of EU Reg. 679/2016).
   - Right to restriction of processing (Art. 18 of EU Reg. 679/2016).
   - Right to object (Art. 21 of EU Reg. 679/2016).
   - Right to data portability (Art. 20 of EU Reg. 679/2016).

   If you believe that the processing of your personal data, carried out by the data controller, is in violation of the provisions of EU Reg. 679/2016, you have the right to lodge a complaint with the competent Supervisory Authority, as provided for by Art. 77 of EU Reg. 679/2016 itself, or to take legal action (Art. 79 of EU Reg. 679/2016).
   The processing of your data is <u>not</u> based on art. 6, paragraph 1, letter a), or on art. 9, paragraph 2, letter a).

The full text of the articles of EU Reg. 679/2016 relating to your rights (articles 15 to 22 included) can be consulted at the following link on the website of the Authority for the Protection of Personal Data:
- https://www.garanteprivacy.it/web/garante-privacy-en/home_en

or, alternatively, they will be provided to you by the Data Controller upon your simple request.

e) We inform you that, currently, the data controller does not carry out data processing falling within the obligation to designate a "Data Protection Officer" (DPO), as detailed in Articles 37-38-39 and Recital 97 of EU Reg. 2016/679.

f) In the event that the personal data provided must be processed for purposes other than and in addition to those indicated above, the Data Controller, prior to such further processing, undertakes to provide you with all the information regarding such different purpose and any further relevant information pursuant to Art. 13 of EU Reg. 679/2016, paragraph 2.

g) The acquired data will never be processed for the purpose of carrying out an automated decision-making process (so-called profiling).