

## **PRIVACY NOTICE**

### **pursuant to articles 13 and 14 of EU Regulation n. 679/2016**

#### **INTRODUCTION**

**Teoresi S.p.A.**, in accordance with the applicable legislation, undertakes to process your personal data, in line with the principles of lawfulness, fairness, transparency, pertinence and minimisation established by Article 5 of EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data ("**GDPR**").

Teoresi S.p.A. invites you, as data subject of the data processing ("**Data Subject/s**"), to read the following privacy notice drawn up pursuant to Articles 13 and 14 GDPR.

\*\*\*

#### **DATA CONTROLLER**

The Data Controller for the processing of your data is Teoresi S.p.A., with registered office in Turin, Via Perugia, 24 - 10152 - P.IVA 03037960014.

The contact details of the Data Controller are: Tel. 011.2408000; e-mail: [privacy@teoresigroup.com](mailto:privacy@teoresigroup.com); PEC: [teoresi.adm@pec.it](mailto:teoresi.adm@pec.it).

#### **DATA PROTECTION OFFICER**

Teoresi has appointed the Data Protection Officer so as required by the GDPR ("**Data Protection Officer**" or "**DPO**"), entrusted by law with monitoring the compliance with the Regulation, with tackling requests from Data Subjects within the context of the legitimate exercise of the rights recognized by the Regulation, as well as with acting as a reference point towards the Privacy Authority.

Without prejudice to par. "Rights of the Data Subjects" of this Privacy Notice, for any issue related to the processing of your personal data, you may contact our DPO at the following email address: [dpo.ask@teoresigroup.com](mailto:dpo.ask@teoresigroup.com)

#### **TYPES OF DATA PROCESSED**

The Data Controller will process your personal data through video surveillance systems. The Data Controller may process the following personal data:

- a) Images and/or videos

#### **PURPOSE AND LEGAL BASIS OF THE PROCESSING**

The data you provide will be processed for the following purposes:

- a) company's assets and property safeguard;
- b) prevention of unlawful conducts;
- c) performance of so-called checks;
- d) individuals' safety;
- e) counteraction activities supporting.

The legal basis for data processing related to purposes a), b), c), and d) is the legitimate interest.

Regarding the purpose under point e), the Data Controller acts for the fulfillment of legal obligations. In any case, the data processed through the video surveillance system will take place exclusively in order to pursue the abovementioned intended purposes.

## PROCESSING METHODS

Teoresi has installed a video recording system with coverage of common areas such as stairways, hallways, entrances, internal access points, and technical rooms reserved for qualified individuals only (Server Rooms). Teoresi informs you that there are no recording cameras in the offices or in the recreation areas.

The images and videos, which are processed through the surveillance systems without intercepting environmental communications or conversations:

- are processed in real time during ordinary working hours;
- without prejudice to the par. "Data retention period" of this Privacy Notice, they will be stored exclusively between 7:00 PM and 8:00 AM on weekdays and 24 hours a day on Saturdays and Sundays.

The Data Controller, in carrying out the processing operations of Personal Data, adopts technical and organizational measures appropriate to the processing risk level, in accordance with the provisions of Article 32 of Regulation (EU) 2016/679. In particular, the processing and collection of your Personal Data will take place using computer and telematic supports suitable to guarantee the security and confidentiality of the data, in accordance with the provisions of Article 32) of the European Privacy Regulation EU/2016/679 (GDPR).

In any case, your Data will be processed:

- only by authorized people,
- solely for the purposes set forth in the previous par. "Purposes and legal basis of the processing",
- at the premises of the Data Controllers and of any Data Processor is located, in accordance with the par. "Data Processors" of this Privacy Notice.

## NATURE OF DATA PROVISION

The provision of your personal data is necessary to pursue the abovementioned legitimate purposes. In company premises, signs are posted indicating the presence of cameras before their coverage area, in order to warn anyone wishing to avoid being recorded by the system thereof. However, since providing personal data is necessary for the purposes mentioned above, refusal by the data subject to provide such data may result in the inability to access the company's premises covered by the video surveillance system.

## DATA COMMUNICATION

The personal data collected through the video surveillance system may be accessed by specific people and for the purposes outlined in this notice only, as well as in compliance with the applicable law. In particular, the data may be communicated to:

- authorized personnel: the data may be processed by employees and collaborators explicitly authorized;
- competent authorities: where necessary and in compliance with applicable laws, the collected data may be communicated to law enforcement officers and/or other competent authorities for the purposes of investigating unlawful conducts or filing legal actions therefor;
- Data processors.

## DATA PROCESSOR

Your personal data may be processed by third parties, which, by virtue of their appointments as Data Processors pursuant to art. 28 of the Regulations, carry out activities linked to the data processing on behalf of Teoresi.

**DATA RETENTION PERIOD**

Please note that, pursuant to art. 5 of the GDPR, in accordance with the principles of lawfulness, purpose limitation and data minimisation, your Data will be kept for the time necessary to achieve the purposes pursued. In any case, the retention period of your personal data will not exceed:

- 72 hours after collection

Once the retention period is expired, images and videos will be automatically deleted from the systems.

**RIGHTS OF THE DATA SUBJECT**

As a data subject, you may exercise the rights provided for by article 15 et seq. GDPR against Teoresi, by sending a communication to the following e-mail address: [privacy@teoresigroup.com](mailto:privacy@teoresigroup.com). Your request will be processed within 28 days.

We also inform you that, with regard to data collected via the video surveillance system, in accordance with applicable laws, considering the existence of a legitimate interest in the processing of such data, certain rights may be subject to limitations, so as reasonably justified by the Data Controller throughout the request management process.