

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; PEC: 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

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, including by identifying the individuals who access the premises of the Data Controller;
- 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

A. Through the (recording) video surveillance cameras

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.

Signs indicating the presence of surveillance cameras are displayed in the company premises before entering their range of action, thereby allowing individuals to avoid being recorded by the system. However, since the provision of personal data is necessary for the purposes mentioned above, any refusal by the data subject to provide such data may result in the inability to access the aforementioned areas subject to video surveillance.

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.

B. Through the (non-recording) video intercoms

Teoresi has installed video intercom systems with a field of view covering common areas such as, by way of example, staircases, corridors, entrances, and internal passageways. These systems allow for the identification of visitors outside the premises who need to access Teoresi's premises, either via audio or video. The audio system is activated only when the individual initiates communication via the intercom.

No video intercoms are installed inside offices or recreational areas.

The data will not be stored and will therefore be processed, potentially in real time, exclusively during regular working hours by personnel operating at the Receptions, in full compliance with the principle of data minimization.

The operations performed on the data do not involve any form of automated processing.

Signs indicating the presence of the video intercoms are displayed close to the video intercoms.

Both in case of videosurveillance systems and video intercoms, 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 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 processing of personal data consists of the following operations:

A. Through the (recording) surveillance cameras:

- Real-time collection of images via video surveillance devices;
- Recording and temporary storage of images on protected digital media;
- Real-time viewing by authorized personnel;
- Possible extraction and retention of specific video excerpts for the purposes set out in this privacy notice;
- Automatic deletion once the established retention period is over.

B. Through (non-recording) video intercom:

- Real-time viewing and identification of individuals when accessing the area covered by the video intercom's field of view.

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

A. Through (recording) surveillance cameras:

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, unless otherwise required by law.

B. Through (non-recording) video intercoms:

Data is not retained.

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. 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.