

Tamini Trasformatori S.r.l. Video Surveillance Privacy Policy for Employees

This policy is to be considered as supplementary to the general policy already made available to employees.

Pursuant to article 13 of Regulation (EU) 2016/679 (hereinafter “**Regulation**” or “**GDPR**”), you are informed that Tamini Trasformatori S.r.l., with registered offices in (20025) Legnano (MI), Italy, at Viale L. Cadorna, 56/A, as data controller (hereinafter “**Controller**”), contactable at the e-mail address privacy@tamini.it, will collect your personal data by means of the video surveillance system installed on its premises on the basis of the collective agreement signed with the trade union representatives in accordance with the provisions of article 4, paragraph 1 of Italian Law 300/1970 (“Workers’ Charter”).

The Data Controller has appointed a Data Protection Officer (“**DPO**”), who is available for all matters relating to the processing of your personal data and the exercise of your rights under data protection legislation and can be contacted at the following e-mail address: dpo@tamini.it.

The system consists of digital video recorders which record images taken by cameras located on the premises of the Controller.

The devices are designed to record images exclusively for security and to protect the company’s assets, in particular for the protection of people and property against possible attacks, workplace accidents, theft, robbery, damage, vandalism to protect people and/or property, such that the viewing angle is limited to the area to be protected.

This policy complements the “simplified” notice provided via the signs placed near our cameras.

Categories and types of data processed

The data processed by the Controller fall within the category of common data and consist essentially of the images recorded by the video surveillance system which depict you, potentially including your face. The personal data indicated will hereinafter be collectively referred to as “**personal data**”.

Purpose and legal basis of the personal data processing

The images recorded via the **video surveillance** system will be processed for the purpose of protecting the company’s movable and immovable assets and protecting people against, for example, possible aggression, workplace accidents, theft, robbery, damage and vandalism. The basis for legitimacy of processing is in the legitimate interest of the Controller in accordance with article 6, par. 1, letter f) of the Regulation, taking into account the provisions of article 88 of the GDPR and article 114 of Italian Legislative Decree. 196/2003 (“Privacy Code”) and on the basis of the aforementioned collective agreement signed with the company trade union representatives.

Such processing does not, in any case, aim to remotely monitor employees’ work activities and is carried out in full respect of the protection of workers and their dignity, with specific reference to the provisions of the Workers’ Charter. Such treatment is based on article 6, par. 1, letter b) of the Regulation, also taking into account article 88 of the GDPR and article 114 of the Privacy Code, as amended by Italian Legislative Decree 101/2018, as well as the aforementioned collective agreement signed with the company trade union representatives.

You can obtain information on how the video surveillance cameras are used, how the checks are carried out and the possible consequences of the checks.

Your personal data may also be processed for the establishment, exercise or defence of legal claims in court, out of court and in the phases preceding litigation on the basis of article 6, par. 1, letter f) of the GDPR. In addition, pursuant to article 6, par. 1, letter c) of the GDPR, your data may be

processed to the extent strictly necessary to fulfil the regulatory obligations the Controller is subject to, including specific requests from the Judicial Authorities and/or the Police.

Personal Data Storage

The images captured via the camera are stored in accordance with the principles of minimisation and limitation of storage in accordance with article 5, par. 1, letter c) and e) of the Regulation, for a period **not exceeding 48 hours** and then automatically deleted, in accordance with the [Provision on video surveillance - 8 April 2010](#) of the Privacy Authority as well as the specific and most recent [Privacy Authority FAQs](#).

The Controller reserves the right, in any case, to retain your personal data for the time strictly necessary to fulfil the regulatory obligations which the Controller is subject to as well as to meet any defence requirements or requests by the Judicial Authorities and/or the Police.

Recipients

Your data could be accessed - both remotely and in real time - by the parties cited below exclusively for the purposes described and in compliance with the provisions of the Regulations, the Privacy Code and the notice issued by the Privacy Authority:

- 1) personnel specifically authorised to process personal data in accordance with articles 29 and 32, par. 4 of the GDPR and 2-*quaterdecies* of the Privacy Code;
- 2) entities that typically act as data processors pursuant to article 28 of the GDPR (e.g. company responsible to maintenance services);
- 3) competent authorities (e.g. judicial authorities and police) who have made a formal request; in this case, the communication of data is necessary to fulfil a regulatory obligation to which the Controller is subject pursuant to article 6, par. 1, letter c) of the Regulation.

Transfer of data outside the EU

Your personal data will not be transferred to third countries.

Your rights

You, as a data subject, may exercise the following rights at any time, in the presence of the relevant legal grounds:

- **Right of access** (article 15 of the GDPR) - you have the right to obtain confirmation as to whether or not personal data relating to you is being processed, and the right to receive any information relating to such processing.
- **Right to rectification** (article 16 of the GDPR) - you have the right to have your personal data rectified if it is incomplete or inaccurate; it should be noted that, with respect to personal data collected through video surveillance systems, the right of rectification cannot be exercised in practice in view of the intrinsic nature of the data collected, which relate to an objective and determined fact.
- **Right to erasure** (article 17 of the GDPR) - in certain circumstances, you have the right to have your personal data deleted from our files.
- **Right to restriction of processing** (article 18 of the GDPR) - under certain conditions, you have the right to obtain the restriction of the processing of your personal data.
- **Right to data portability** (article 20 of the GDPR) - you have the right to obtain the transfer of your personal data to a different data controller, as well as the right to obtain the data concerning you in a structured, commonly used format that is readable by an automatic device.
- **Right to object** (article 21 of the GDPR) – you have the right to formulate a request to object to the processing of your personal data, in which proof must be provided of the reasons that

justify the objection; the Data Controller reserves the right to review this request, which may be rejected if there are legitimate reasons to proceed with the processing that prevail over your interests, rights and freedoms;

- Right to lodge a complaint with a Supervisory Authority (art. 77 of the GDPR) - in the manner indicated in the following paragraph, if you consider that the processing of your personal data is in breach of data protection legislation, you may lodge a complaint with a Supervisory Authority of the Member State in which you normally reside, work or in the place where the alleged breach occurred;
- Right to an effective judicial remedy (art. 79 of the GDPR).

Kind regards,
The Data Controller
Tamini Trasformatori S.r.l.