

Information pursuant to Article 13 REG. (UE) 679/2016 (GDPR)

Premises

The company OHB ITALIA S.p.A. (hereinafter also the “Company”), as Data Controller, wishes to inform you that some areas of the Company's headquarters, duly reported before the relevant range of action with specific signs, are monitored by a video surveillance system for internal security needs, protection of company assets and people with respect to possible attacks, thefts, robberies, damage, as well as for fire prevention and workplace safety purposes and production needs.

1. Data Controller

OHB ITALIA S.p.A. is the Data Controller, having its headquarters in Milan (MI), Via Gallarate n.150, CAP 20151 (P.IVA: 08921330158; tel.02/380481; e-mail: legalgdpr@ohb-italia.it; PEC: ohb-italia@legalmail.it).

2. Type of processing data

Therefore, the Company will process data relating to images coming from the video surveillance system of people who access or pass through the premises where the systems work actively; only images that are strictly relevant and do not exceed the purposes listed in the following paragraph will be processed.

3. Purposes and legal basis of processing

Purposes:

The shooting and recording of images are functional to the pursuit of the following purposes: internal and personal safety and protection of company assets; fire prevention and safety at work; production needs.

Data processing, pursuant to what is provided for by the Italian Law n. 300/1970, Art. 4, (“Workers’ Statute), has been authorised upon an agreement with Unions, occurred on June 7th, 2024.

Such data is acquired and stored for the time strictly necessary to pursue these purposes and, therefore, to ensure the safety of the premises, guarantee the protection of company assets and people in full compliance with the provisions of the Reg. (EU) 679/2016, as well as the provisions imposed by the Italian Data Protection Authority.

The system does not make any connection, cross-referencing or comparison of the images collected with other personal data.

Legal Basis:

The detection of images and the related processing, using a video surveillance system, although optional, are nevertheless necessary for the pursuit of the above-mentioned extensive purposes and must be considered to fall within the principle of balancing interests pursuant to what was established by the Italian Data Protection Authority with the measure taken on April 8th, 2010, which establishes that consent is not necessary if the detection of the images *“is aimed at pursuing legitimate interests vested either in the data controller or in a third party by obtaining items of evidence – in accordance with the arrangements laid down in this decision – or else with a view to protecting individuals and property against possible attacks, theft, robberies, damage, or vandalism, or else for the purpose of fire prevention and/or occupational safety”*. Therefore, this processing is not subject to the obligation of consent as it is aimed at pursuing the legitimate interest of the Data Controller, pursuant to Art.6, co. 1 (f) of the GDPR and Article 6.2 of the Decision on Video Surveillance taken by the Italian Data Protection Authority on April 8th, 2010.

4. Treatment modalities

All technical and organizational data protection measures are adopted and implemented. Specifically, images that are collected through a video surveillance system can be examined exclusively by the Data

Controller in the person of the legal representative or by the subjects expressly authorized in writing by the Data Controller, pursuant to art. 29 of the GDPR.

The video surveillance system located in the Milan office, Via Gallarate n.150, is equipped with:

- n.11 closed-circuit video cameras, located outside the building to monitor access to the headquarters and whose presence is indicated by special signs, which inform interested parties that they are about to access, or that they already are, in the video-monitored area;
- monitors for real-time image viewing;
- password-protected registration equipment, accessible only by persons expressly authorized by the Data Controller pursuant to Art.29 GDPR with a password-protected Operator Client.

The monitors and the video recording system are located at the headquarters in Milan, via Gallarate n.150.

The video surveillance system allows the simple viewing of images in real time and the recording of them. These registrations will be accessible only, in addition to the Data Controller in the person of the legal representative, to the subjects expressly authorized by written document, pursuant to art. 29 GDPR.

The video-monitored areas are marked with a special sign, and, in any case, the cameras will not record places reserved exclusively for employees, such as services or changing rooms.

The processing of such data takes place lawfully and correctly in order to guarantee the confidentiality and security of the same in compliance with Art. 5 and 32, GDPR, as well as the Provision of the Italian Data Protection Authority regarding video surveillance of April 8th, 2010, and the European Data Protection Board (EDPB) Guidelines 3/2019 on processing of personal data through video devices.

5. The period for which the personal data will be stored

In compliance with the principles of lawfulness, purpose limitation and data minimization, pursuant to Art. 5 Reg. (EU) 2016/679, such data will be kept for the time strictly necessary to pursue the purposes for which they are processed. In particular, in implementation of the principles of necessity and proportionality provided for by the legislation and taking into account the specific type of activity carried out by the Company, they will be kept for a maximum duration of 48 hours following registration, with the sole exception of special needs for further conservation in relation to holidays or closure of offices and services, with reference to which storage is expected for a time not exceeding 72 hours, as well as in the event that a specific investigative request from the Judicial Authority or the Judicial Police must be adhered to. At the end of the retention period the images are automatically deleted by overwriting. The use of detected images for purposes other than those specified above is never permitted.

6. Communication and Dissemination

The detected images will never be released abroad.

With reference to the purposes of the processing listed above, however, the following subjects may become aware of such data:

- subjects who can access it due to legal obligations established by EU law or the Member State applicable to which the Data Controller (e.g. Judicial or Public Security Authority);
- the employees working at the Company, only upon a specific written authorization issued in accordance with Art. 29 GDPR;
- the company providing the video surveillance service in the event of maintenance activities of the facility, appointed as External Data Controller in accordance with Art.28 GDPR.

7. Transfer of personal data

Your data will not be transferred either to Member States of the European Union or to Third Countries not part to the European Union.

8. Data Subject's rights

At any time, the Data Subject may exercise, pursuant to Articles 15 to 22 of Regulation (EU) 2016/679, the right to:

- request confirmation of the existence of your personal data, as well as access to them, and to gain the related information;
- obtain information about the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data have been or will be communicated and, when possible, the data retention period;
- obtain restriction of processing;
- oppose to processing at any time;
- oppose to automated decision-making relating to natural persons, including profiling;
- ask the data controller to access or delete personal data or limit the processing concerning him or her or to oppose their processing;
- revoke consent at any time without prejudice to the lawfulness of the processing based on the consent given before the revocation;
- file a complaint with a supervisory authority and, in particular, with the Italian Data Protection Authority for the protection of personal data pursuant to Art. 77 GDPR.

It should be noted that the right of updating, integration and the right of rectification pursuant to Art. 16 GDPR cannot be exercised in practice in view of the nature of such data, as these are images collected in real time and concerning an objective fact. Furthermore, the right to data portability, pursuant to Article 20 GDPR, cannot be exercised as the processing is carried out by virtue of the legitimate interest of the Data Controller.

The right of access by the data subject must be exercised, in light of the data retention time and the timescales necessary to access them, within twenty-four hours following the collection.

Said application must contain the elements capable of circumscribing the subject-matter of the request and, at least, the following:

name and surname of the data subject;

location or locations of possible filming;

shooting date and time slot (approximately 30 minutes);

elements likely to identify the person concerned within the recovery (e.g., clothing worn, accessories, presence of companions).

The data subject may have access only to data relating to him or her directly and such access may not include any data referring to third parties, except where the breakdown of the data renders the personal data relating to the data subject incomprehensible. If the request for access is expressly aimed at acquiring information or data from third parties, this must be duly motivated and will be subject to a specific evaluation by the Company which may refuse access where the interest in protecting the personal data of the third party prevails with respect to the right that the interested party intends to assert as can be deduced from the motivation provided by the applicant. In any case, the Data Controller guarantees that the data will be examined by a specially appointed data controller before any access to them by the interested party.

In any case, once the retention periods provided for and specified above have passed, it will no longer be possible to accept the request for access to such data.

At any time, you can exercise each of your rights with a written request sent to the Data Controller, in the person of the legal representative who can be contacted via the following contact details: e-mail: legalgdpr@ohb-italia.it; PEC: ohb-italia@legalmail.it.