



Video Surveillance Policy

Revision:	000
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Approved by:	Presidente del C.d.A.

Data controller:	O.M.P. Officine Mazzocco Pagnoni S.r.l. ("Company") manages the subject data, consisting of the video images of the same, in accordance with Regulation (EU) 2016/679 ("GDPR"), National Data Protection Laws as well as video surveillance guidelines adopted by Data Protection European committee on July 10th 2019, General Provision on video surveillance, of April 8 th 2010, issued by the Italian Data Protection Authority ("Data Protection Authority") and to article 4 of Law no.300 / 1970.
Authorized persons within the company involved in data processing:	The use and viewing of video recordings by company authorized personnel is regulated by a specific internal agreement and is limited to cases of unauthorized access and / or, in general, to events involving workplace safety violations, accidents or company and workers assets violations and is exclusively addressed to the communication to public authorities, in case of request.
Data subjects:	The company, through the video surveillance system, (i) plant area, including appurtenances and external access, and (ii) buildings inside plant area, processes and detects the images of the subjects passing in front the range of video cameras.
Legal basis of the processing:	The processing of data is aimed to pursue the legitimate interest of the Company as well as the preservation of the company assets and the security of working areas. The video surveillance system is limited to external areas and buildings and has been approved, with the signing of a specific agreement, by the syndicate representatives.
Data retention period:	Video images are retained for one week after their recording and will be automatically deleted after this period, except for special needs of longer conservation (such as company closure, evidence needed in case of theft or requests from legal authority or police).
Rights:	To exercise the rights provided for by applicable National Data Protection Laws and the GDPR (articles 15 et seq.), data subjects may contact the Company or Company's data processors or external reference, if any.
Right to object:	With the same procedures described above, data subjects may object, in whole or in part, to the processing of their personal data, where the relevant legal basis is constituted by the legitimate interest of the Company, pursuant to and for the purposes of the provisions of Article 21 of the GDPR.
Complaint:	Any data subject who believes that the processing of data concerning him or her is in violation of the GDPR, in accordance with the provision of article 77 of the GDPR, may lodge a complaint with a supervisory authority where the data subject usually lives or works or with a supervisory authority where the alleged infringement has occurred.
Updates and Revisions:	The Company reserves the right to modify and/or update the Privacy Policy, also taking into account any subsequent additions and/or amendments to national and/or EU legislation regarding the protection of personal data or consequent to any new purposes of data processing that may arise. The new versions of the Privacy Policy will replace the previous ones and will be valid, effective and applied starting on the date of publication on the Company website or the date of communication to the data subjects.