

## Privacy policy on the processing of personal data pursuant to arts. 13-14 EU Regulation 2016/679

### Data subjects: those subject to video-surveillance.

COEM S.p.A. in its capacity as Data Controller of your personal data, pursuant to and by the effects of EU Regulation 2016/679, hereinafter the 'GDPR', hereby informs you that the above-cited regulation provides for the protection of data subjects with respect to the processing of personal data and that said processing shall be characterised by the principles of correctness, lawfulness, transparency and the protection of your confidentiality and your rights.

Your personal data will be processed in compliance with the legislative provisions of the above-cited regulation and with the confidentiality obligations provided for therein.

The purposes and the legal basis of the processing: specifically, your data will be used for the following purposes necessary for the pursuit of the data controller's legitimate interests:

- Video-surveillance installed for the purpose of personal security and the protection of company assets by means of video-cameras positioned in work areas (with the exclusion of changing rooms and bathrooms), duly indicated. Video-surveillance is installed in the workplace in compliance with legal provisions in the forms required by law and sector regulations. The Video-Surveillance System acts as a deterrent and as a possible source of evidence in the event of criminal acts. The images will be accessible only to expressly delegated staff and, unless otherwise provided for by the authorities, recorded and stored for a maximum period of time of 24 hours or 48/72 hours in the case of bank holidays. Subsequently, the images will be immediately cancelled through over-recording, except as provided for by any provisions or requests of the Authorities unless otherwise provided for or requested by the Authorities or the Criminal Investigation Department or, in all events, further to the occurrence of crimes inside the company premises (e.g., damage to company assets, non-authorized access, theft etc.).

For the purpose of the indicated processing, the Data Controller may gain knowledge of particular categories of personal data and, specifically: Recorded Video-Surveillance Film. The processing of personal data for these particular categories are performed in compliance with art. 9 of the GDPR.

Methods of processing. Your personal data may be processed in the following ways:

- processing by means of electronic devices.

Every processing activity occurs in compliance with the procedure pursuant to arts. 6 and 32 of the GDPR and through the adoption of appropriate prescribed security measures.

Your data will be processed only by staff expressly authorised by the Data Controller and, specifically, by the following groups of staff:

- individuals, authorised for processing activities, to use the equipment, in cases in which this is essential for the purposes pursued, to see the recordings.

Communication: Your data may be communicated to external individuals and legal entities for a correct management of the relationship and specifically in the following categories of Recipients operating in their capacity as External Data Processor or Autonomous Data Controller:

- Criminal Investigation Department and Public Security Authorities.

Dissemination: Your personal data will not be disseminated in any way.

Your personal data may also be transferred, within the limits of the above-described purposes, to the following states:

- with reference to the purposes of the video-surveillance, established in the times agreed with the Unitary Workplace Union Structure.

Data Controller: in accordance with the law, the Data Controller is COEM S.p.A. (Via Cameazzo 25, 41042 Fiorano Modenese (MO); VAT no.: 01927780369; contactable at the following addresses: E-mail: [privacy.coem@coem.it](mailto:privacy.coem@coem.it); Telephone: 0536 993511) in the person of its pro-tempore legal representative.

You have the right to obtain from the data controller the erasure (right to be forgotten), limitation, updating, rectification, portability, opposition to the processing of personal data regarding you, as well as, in general, to exercise all the rights provided for by arts. 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR by writing to [privacy@coem.it](mailto:privacy@coem.it). You can also make a claim to the competent control body if you consider that the processing of your data is contrary to current law.

You can also examine the updated version of this policy at any time, connecting to the internet address <https://www.privacylab.it/informativa.php?07369429345>.

## **Reg. EU 2016/679: Arts. 15, 16, 17, 18, 19, 20, 21 and 22 – Rights of the data subject**

1. The data subject has the right to obtain confirmation of the existence or not of personal data relating to them, also if not yet registered, their communication in legible form and the possibility of making a claim to the control Body (Italian Data Protection Agency).

2. The data subject has the right to obtain indication:

- a. of the origin of the personal data;
- b. of the purposes and methods of processing;
- c. of the logic applied in the event of processing carried out with the use of electronic instruments;
- d. of the general details of the data controller, of the data processors and of the designated representative pursuant to article 5, paragraph 2;
- e. of the individuals or legal entities or categories of individuals or legal entities to which personal data may be communicated or which they may gain knowledge of in their capacity as designated representative in the national territory, of data processors or persons in charge of processing.

3. The data subject has the right to obtain:

- a. the updating, rectification or, when of interest, integration of the data;
- b. the erasure, transformation into anonymous form or the blocking of data processed in breach of the law, including those for which storage is not necessary in relation to the purposes for which the data have been collected or subsequently processed;
- c. certification that the operations as per letters a) and b) have been brought to the attention, also with regards to their content, to those to which the data have been communicated or disclosed, with the exception of cases in which said fulfilment is impossible or involves a clearly disproportionate use of resources with respect to the protected right;
- d. the portability of the data.

4. The data subject has the right to oppose, in whole or in part:

- a. for legitimate reasons to the processing of personal data relating to them, although pertinent to the purpose of collection;
- a. to the processing of personal data that relate to them for the purpose of the sending of advertising material or of direct sales or for the carrying out of market research or commercial communications.