

## **INFORMATION ON VIDEO SURVEILLANCE CONSTRUCTION SITES**

Pursuant to art.13 of the European Regulation 2016/679 (GDPR), the Company Autostrade per l'Italia S.p.A. ("ASPI"), as Data Controller of personal data, informs you about the installation of a video surveillance system at the construction sites on the freeway network under its responsibility, whose systems (cameras) - duly indicated by means of special signs placed on the accesses to the construction sites and/or in their vicinity and in any case before and/or outside the filming limit - are installed in proximity to and on the accesses of the construction sites themselves, in compliance with the provisions of the aforementioned GDPR and L. No. 300/1970 (Workers' Statute) as well as by the Provision of the Italian Data Protection Authority for the Protection of Personal Data on video surveillance (April 8, 2010).

These facilities are set for filming individuals (ASPI personnel/staff of contractors or other employers, suppliers, etc., hereafter referred to as "insiders") and vehicles accessing construction sites and allow for the collection and recording of the image of such individuals (including their face) and the license plate of vehicles entering their visual range; the images regarding individuals, who enter such "visual range," make it possible to identify/recognize them.

This video surveillance system is functional to ensure safety of people and property at construction sites, in accordance with the current relevant regulations, and, specifically, the control of access to construction sites, the activation of prompt intervention in case of "emergency" and the protection of the company's assets.

### **1. DATA CONTROLLER**

Autostrade per l'Italia S.p.A. with headquarters at Via A. Bergamini, 50 - 00159 Rome.

The Data Protection Officer (DPO) of Autostrade per l'Italia S.p.A. is domiciled for its function at the Company's registered office and can be contacted at the certified electronic e-mail address: [dpo@pec.autostrade.it](mailto:dpo@pec.autostrade.it).

### **2. TYPES OF DATA PROCESSED**

Personal data processed by Autostrade per l'Italia S.p.A. include:

- Video surveillance data (images taken by cameras of individuals and vehicle license plates at the site access stage)
- Common access-related data (biographical and identification data, social security number, employee registration number/company identification code, license plate)
- Other access-related data (date, time of entry, time of exit from the site).

Cameras are installed in such a way as to capture individuals and vehicles accessing the construction sites, through appropriate gates, allowing the recognition/identification of people. The detection of vehicle license plates configures "indirect" processing of personal data, depending on the possible association of this data with the identity of the vehicle owner and other information associated with the above data.

### **3. PURPOSE AND LEGAL BASIS FOR PROCESSING**

Personal data collected are processed in accordance with the law and according to the principles of necessity, minimization, fairness, proportionality and transparency, for the sole purpose of ensuring "safety at construction sites" and, in particular:

- a. The control of access gates to construction sites;

- b. The protection of "insiders" who access and work on construction sites;
- c. Emergency and hazard response and related first aid on the basis of the "count" of people and vehicles accessed on a given day/time;
- d. The control of the adoption of "protective equipment" ("PPE") by the workers, as well as
- e. the safeguarding of company assets, and, in particular, to prevent vandalism or damage to protect company assets and the assets of contractors, which are located within and at the outer limits of construction sites.

The video surveillance system is installed in compliance with the prohibition set forth in Article 4 of the Workers' Statute, whereby video surveillance is never used to remotely monitor the work activities of ASPI's and/or contractors' or other employers' employees, who in any capacity carry out their work activities, even occasionally, within the worksite to which they have had access through the areas controlled by the cameras. ASPI guarantees that the images are in no way used as a tool for remote surveillance and monitoring of the aforementioned personnel and in general of the interested parties who access the construction sites/transit the videotaped areas.

Such data are processed:

- (i) for the purposes at letters a), b), c) and d), on the legal basis of the legal obligation, ex art. 6, paragraph 1, lett. c) of the GDPR, and in particular of the obligations provided for by Legislative Decree 81/08 and art. 2087 c.c., DLgs231/0 and articles 589 and 590 c.3 c.p., to which ASPI is subject,
- (ii) for the purposes referred to in (e), on the legal basis of the assumption of the legitimate interest of the Owner, pursuant to Art. 6, paragraph 1 (f) of the GDPR, in the safety of the working environment and the protection of its own personnel and that of other employers, collaborators/suppliers as well as the integrity of the company's assets.

The processing of images for the purposes of (a), (b), (c) and (d) is also carried out on the legal basis of consent pursuant to Article 6(1)(a) of the GDPR when the insiders, after viewing the special warning signs inherent in the "simplified" information, arranged outside the visual range of the surveillance cameras, have chosen to enter the visual range itself.

#### **4. TREATMENT MODE**

The processing of images is carried out by means of computer and telematic tools, and in particular by means of a system composed of video cameras, real-time control monitors and a hard - disk active 24 hours a day, seven days a week (including holidays), with logics strictly related to the purpose of security and protection indicated in point 3 above and in any case in such a way as to guarantee the security and confidentiality of the images themselves, in compliance with the regulations in force.

The location of cameras, viewing angle, and filming methods are established to ensure minimization of processed data and in compliance with the principles of image relevance and non-excessiveness.

Media are stored in protected premises that are not accessible except by personnel assigned in writing who have received adequate training on the use of the facility itself and protected with appropriate security measures of a technical, procedural and organizational nature, which guarantee a level of security appropriate to the risk as well as the compliance of processing operations with current legislation on the protection of personal data and workers' rights, preventing the improper use of the images.

## **5. DATA RETENTION TIME**

The retention of processed images is normally for a period of 24 hours from their detection (maximum of 72 hours in case of site closure for holidays), in compliance with the principle of minimization ex art. 5.1.c) GDPR and the Provision of the Italian Data Protection Authority for the Protection of Personal Data on video surveillance (April 8, 2010 subject to any additional retention periods in the case of images proving crimes, which are retained for the period strictly necessary to contest the crimes themselves and define any litigation and due to specific investigative requests by the Judicial Authority). The deletion of images is done automatically by overwriting.

## **6. RECIPIENTS OF THE DATA**

Within Autostrade per l'Italia S.p.A., only those persons entrusted with the processing by the Data Controller and authorized, pursuant to art. 2-quaterdecies of Legislative Decree 196/2003, to operate the video surveillance systems as well as to carry out the processing operations may become aware of such personal data.

Third parties (e.g., guarding and surveillance companies) required to process the data/images for the purposes mentioned in item 3 and/or for purposes ancillary to the activities mentioned in item 3 above may become aware of the data/images, and they are appointed "Data Processors" for this purpose pursuant to Article 28 of the GDPR.

The aforementioned data may be disclosed to third parties (parent/subsidiary companies involved or third-party companies) required to process the information for the same purposes as in point 2 above, which are, for this purpose, appointed "Data Processors" pursuant to Article 28 GDPR.

The full list of individuals appointed as Data Processors is made available from the Data Protection Officer.

Without prejudice to the above, images/data will not in any way be communicated or disseminated to third parties, except for the needs of police and justice. In the presence of an offence or the concrete danger of its occurrence, the competencies that the laws assign for these purposes to the public security and judicial authorities will be respected, who, by way of enforcement, may view the images.

## **7. RIGHTS OF INTERESTED PARTIES**

Finally, we would like to inform you that Articles 15-22 GDPR give data subjects the possibility of exercising specific rights; the data subject may obtain from the Data Controller: access, deletion of data concerning him/her, restriction of processing as well as to obtain in a structured, commonly used and machine-readable format, data concerning him/her, pursuant to Art. 20 GDPR; since it is video surveillance data, the right to rectification and integration of the same is not actually exercisable in view of the intrinsic nature of the data collected since it is images collected in real time concerning an objective fact.

In addition, the data subject has also the right to object to the processing; in such a case, the Data Controller reserves the right not to act on the application, and thus to continue the processing, if there are compelling legitimate reasons to proceed with the processing that override the interests, rights and freedoms of the data subject.

The above rights may be exercised by making a request addressed without formality to the Data Protection Officer (DPO) at the following certified electronic email address: [dpo@pec.autostrade.it](mailto:dpo@pec.autostrade.it), through the use of appropriate forms made available by the Controller on the website [www.autostrade.it](http://www.autostrade.it).

We also inform you that you may lodge a complaint under Article 57 letter f) GDPR with the Data Protection Authority in the manner found on the website [www.garanteprivacy.it](http://www.garanteprivacy.it) of the Italian Data Protection Authority itself.

## **8. POSSIBLE TRANSFER ABROAD OF PERSONAL DATA**

The management and storage of the Data take place on servers located in Italy; the Data Controller will be entitled to use servers, located within the European Union, of third-party companies, appointed as Data Processors.

The Controller does not intend to transfer Personal Data outside the European Union.

## **9. CHANGES TO THE DISCLOSURE**

ASPI reserves the right to make changes and updates over time, as necessary, to this Policy.

This Notice supplements the "simplified" Notice provided through the signs placed at the cameras.

Version 2.1 December 2023