

Information - Video Surveillance System at the Rome Nursery School

Pursuant to art.13 of European Regulation 2016/679 (GDPR) Autostrade per l'Italia SpA, in its capacity as Data Controller, provides the following information on the processing of personal data by the video surveillance system. This system (video cameras) is installed and runs near the access to and around the perimeter of the building designated as the "company nursery" inside the "Villa Fassini" and in the relevant areas, under the responsibility of the Data Controller, in compliance with the provisions of the aforementioned GDPR, as well as with the Data Protection Authority's measure on the protection of personal data on video surveillance (8 April 2010) and Guidelines 3/2019, adopted on 29.01.2020 by the European Data Protection Board (EDPB).

1. DATA CONTROLLER

Autostrade per l'Italia S.p.A. with registered office in Via A. Bergamini, 50 - 00159 Rome. The Data Protection Officer (DPO) of Autostrade per l'Italia S.p.A. is domiciled for the purpose at the company's registered office.

2. TYPES OF DATA PROCESSED

Personal data processed by Autostrade per l'Italia S.p.A. include video surveillance data (images taken with cameras).

3. PURPOSE AND LEGAL BASIS OF PROCESSING

The personal data (images) collected are processed to guarantee safety and protection of the persons who, for various reasons, access the building of the nursery school referred to in the preamble; in addition to that, the purpose is to safeguard the company's assets, and, in particular, prevent damages to company assets, which are located inside and outside the building of the nursery school, and ensure the safety of people accessing the building.

These data are processed based on the assumption of the legitimate interest of the Data Controller in carrying out the processing for the aforementioned purposes, pursuant to art. 6(1)(f) of the GDPR.

The provision of data is necessary to access the premises; without it, access to the premises will not be possible.

4. DATA PROCESSING METHODS

Images are processed by means of IT and telematic tools, and in particular by means of a system composed of video cameras, real-time control monitors and a hard disk that is active 24/7 (including holidays), with logics related to the security and protection purposes indicated in point 3 above and in any case in such a way as to guarantee the security and confidentiality of the images, in compliance with the regulations in force.

The media are stored in protected premises and are not accessible except by authorised personnel who have received adequate training in their use.

5. DATA RETENTION PERIOD

Processed data are normally kept for 24 hours, in compliance with the principle of minimisation pursuant to art. 5(1)(c) of the GDPR and the Personal Data Protection Authority Measure on video surveillance (8 April 2010), except in the case of images proving offences, which are kept for the period strictly necessary to contest the offences and settle any disputes.

6. DATA RECIPIENTS

Within Autostrade per l'Italia S.p.A., only the persons tasked with the processing by the Data Controller and authorised to perform the processing operations within the scope of the aforementioned activities may acquire the personal data provided.

The data may be disclosed to third parties (e.g., security and surveillance companies; suppliers of IT services that enable the operation and maintenance of the system) who are obliged to process the data for the purposes set out in point 3 and also for the possible defence of rights in court, who are appointed as "Data Processors" for this purpose pursuant to art. 28 of the GDPR.

Video surveillance system management and video surveillance data processing/management and storage activities are carried out on behalf of Autostrade per l'Italia SpA by: EssediEsse - Società di Servizi SpA, with registered office in Rome, Via A. Bergamini, 50, 00159-Rome, appointed for this purpose as Data Processor pursuant to art. 28 of the GDPR.

Without prejudice to the above, the images will not be communicated or disseminated to third parties in any way, except for police and judicial purposes. In the presence of an offence or of the concrete danger of its occurrence, the competences assigned by law for such purposes to the public security and judicial authorities, which, by way of enforcement, may view the images, will be respected.

7. RIGHTS OF DATA SUBJECTS

Finally, we would like to inform you that Articles 15-22 GDPR give Data Subjects the possibility to exercise specific rights. In particular, the data subject may obtain from the Data Controller: access to the deletion of data concerning them, the restriction of processing, as well as the acquisition in a structured, commonly used and machine-readable format of data concerning them, pursuant to art. 20 of the GDPR. Since this is video-surveillance data, the right to rectification and supplementation cannot be exercised in view of the intrinsic nature of the data collected, as these are images collected in real time concerning an objective fact.

Data Subjects may also object to the processing. Where the Data Subject exercises the right to object to the processing, the Data Controller reserves the right not to process the request, and thus to continue processing, if there are compelling legitimate grounds for processing that prevail over the interests, rights and freedoms of the Data Subject.

The aforementioned rights may be exercised by making a request addressed without formalities to the Data Protection Officer (DPO) at the following PEC address: dpo@pec.autostrade.it, by using the appropriate forms made available by the Data Controller on the HYPERLINK website "<http://www.autostrade.it>".

We also inform you that you may lodge a complaint pursuant to art. 57(f) of the GDPR with the Data Protection Authority

8. TRANSFER OF PERSONAL DATA ABROAD

Data are managed and stored on servers of third-party companies appointed as Data Processors and located in Italy; the Data Controller may use servers of third companies located within the European Union.

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

9. AMENDMENTS TO THE INFORMATION

The Data Controller reserves the right to amend and update this Information with further indications over time, also in consideration of regulatory changes or measures of the Data Protection Authority and the European Commission.

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

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