

ART. 13 REG. EU 2016/679

processing of your personal data: WHO PROCESSES YOUR PERSONAL DATA Data Contoller: GDS Communication srl – Benefit Company VAT: IT01477560138 Address: via M. Tentorio, 4/A – 22100 – Como (CO) Description: Average of the second second

In accordance with European Union Regulation No. 2016/679 (hereinafter "GDPR") and Article 13 in particular, please find below the information required by law relating to the

HOW AND FOR WHAT PURPOSES WE PROCESS YOUR PERSONAL DATA

Please find below all the information to understand which personal data we need to process. As a result of failure to provide personal data, when they are a necessary requirement, you will not be able to access the areas of the company.

| you wi  | I not be able to access the   | areas of the corr   | ipany.   |                        |   |   |  |   |  |
|---|---|---------------------|--|------------------------|---|---|--|---|--|
|   | Data processing purposes  | Data type           | Processed data                                 | Legal basis            | Necessary<br>data   | Н   | Data retention   | Third parties recipient of the personal data                  |  |
| VIDEO SURVEILLANCE<br>• Supporting protection of<br>property and assets<br>• Supporting protection of<br>people's safety<br>• Collection of evidence in<br>case of offenses |   | Personal            | • Images                                       | Legitimate<br>interest | Yes   | Up to 72 hours  |  | <ul> <li>Police Forces</li> <li>Judicial Authority</li> </ul> |  |
| HOW   | ONG WE KEEP YOUR  | PERSONAL D          | ATA  |                        | TO WHO  | M WE C  | SCLOSE YOUR PE   | ERSONAL DATA  |  |
| Ľ   | by order of an Authority. At the end of the retention period your personal data will be deleted. Therefore, after this period, the right of access, cancellation, rectification and the right to data portability can no longer be exercised.   |                     |  |                        |   | Your data will be disclosed to third parties in cases where a law requires us to do so, as in the case of administrative, accounting and tax obligations. Also, your data may be communicated to other parties, which could be involved in the processing activities. You will find in the table the categories of recipients to whom we may communicate your data. In these cases, we stipulate appropriate contracts with the external organizations, to authorize them to process your data on our behalf. |  |   |  |
| HOW   | IOW WE PROCESS YOUR PERSONAL DATA   |                     |  |                        |   | FACIAL RECOGNITION  |  |   |  |
| <b>(</b> )  | Your data will be processed by persons specifically authorized for this activity and / or<br>by data processors, who are also authorized. The Data Controller verifies and checks<br>their work. The processing will be carried out with the aid of electronic tools (including<br>automated means) in addition to manual means, always respecting the provisions of the<br>Italian Data Protection Code (D. Igs. 196/2003) and the GDPR, to guarantee the security<br>and confidentiality of your personal data. |                     |  |                        | The video surveillance system does not use or directly indirectly facial recognition systems.   |   |  |   |  |
| AUTO  |   |                     |  |                        |   | TRANSFER OF PERSONAL DATA OUTSIDE EEA   |  |   |  |
| ₽,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,  | We do not use systems that make automated decisions based on personal data.   |                     |  |                        |   | Personal data are managed within countries belonging to the European Economic Area (EEA).   |  |   |  |
| PROF  |   |                     |  |                        |   | PUBLIC DISCLOSURES OF PERSONAL DATA   |  |   |  |
| ٢   | We do not use your data   | for profiling activ | ities.   |                        | <b>(</b> ((   | No perso  | nal data provided will b   | e disseminated.   |  |
| VIDEC   | /IDEO SURVEILLANCE  |                     |  |                        |   |   | ILS  |   |  |
| <b>&gt;</b>   |   |                     | are under video surveillance.<br>icated signs. | You will find          | $\succ$   | E-mail:<br>Phone:<br>Web:<br>DPO:   | privacy@gdscom.it<br>+39 031 560023<br><u>www.gdscom.it</u><br>dpo@gdscom.it |   |  |
| DATAS   | SUBJECT'S RIGHTS  |                     |  |                        |   |   |  |   |  |
| Î   | As a Data Subject, you can exercise your rights, as required by articles 13, 15-23 of the GDPR.<br>To do this, you can contact us through the contact form indicated above.<br>We will reply to you within one month. In cases of particular complexity of the request, we may reply to you within three months, but in this case we will notify you.<br>In summary, the Data Subject, with reference to personal data concerning him, has the possibility:   |                     |  |                        | <ul> <li>To obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and, where the personal data are no collected from the data subject, any available information as to their source;</li> <li>To request from the controller access to and rectification or erasure o personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;</li> <li>To withdraw consent at any time, without affecting the lawfulness o processing based on consent before its withdrawal;</li> <li>To lodge a complaint with a supervisory authority, which in Italy is constituted by the "Garante per la protezione dei dati personali", which can be contacted through the references found on the website</li> </ul> |   |  |   |  |

http://www.garanteprivacy.it