

## **Privacy Policy for Personal Data Processing according to Articles 13-14 of EU Regulation 2016/679**

### **Data Subjects: Video Surveillance Subjects**

OMAS SPA, as the Data Controller for your personal data, pursuant to EU Regulation 2016/679, hereinafter referred to as the 'GDPR,' hereby informs you that the aforementioned regulation provides for the protection of data subjects concerning the processing of personal data, and that such processing will be based on the principles of fairness, lawfulness, transparency, and the protection of your privacy and rights.

Your personal data will be processed in accordance with the legal provisions of the aforementioned regulation and the confidentiality obligations provided therein.

**Purposes and Legal Basis for Processing:** In particular, your data will be processed for the following purposes related to the fulfillment of legal or contractual obligations:

- Mandatory tax and accounting obligations
- Management of disputes

Your data will also be used for the following purposes necessary for the pursuit of the legitimate interests of the data controller:

- Recordings will be stored for a limited period, typically a few hours or at most, within twenty-four hours after the recording, subject to special needs for further retention related to holidays or office closures, as well as in cases where it is necessary to comply with a specific investigative request from the judicial or police authorities.
- The video surveillance system is introduced as a complementary measure to improve security inside or outside buildings or facilities where productive, industrial, commercial, or service activities take place, or with the purpose of facilitating the exercise, in civil or criminal proceedings, of the data controller's or third parties' right to defense based on useful images in the event of unlawful acts.

**Processing Methods:** Your personal data may be processed using the following methods:

- Processing through electronic computers
- Data usage for consultation only

Each processing operation is carried out in compliance with the methods set out in Articles 6 and 32 of the GDPR and through the adoption of adequate security measures. Your data will be processed exclusively by personnel expressly authorized by the Data Controller, in particular by the following categories of authorized personnel:

- Individuals who have been expressly designated in writing, authorized to use the systems, and, where necessary for the purposes pursued, to view the recordings (Article 30 of the Code).

**Communication:** Your data may be communicated to external parties for the proper management of the relationship, in particular to the following categories of recipients, including all Data Processors duly appointed:

- External data processors and authorized agents have been designated, as the external organization provides instrumental and subordinate services to the data controller concerning video surveillance management.

Disclosure: Your personal data will not be disclosed in any way.

Retention Period: We would like to inform you that, in accordance with the principles of lawfulness, purpose limitation, and data minimization set out in Article 5 of the GDPR, the retention period for your personal data is established as follows:

- It is set for a period not exceeding the time necessary for the purposes for which they were collected and processed and in compliance with the mandatory time limits prescribed by law.

Data Controller: The Data Controller for your data, pursuant to the Law, is OMAS SPA (via Lauretana sp.23 degli Svarchi, 60026 Numana (AN), VAT: 00095880423).

You have the right to obtain from the Data Controller the erasure (right to be forgotten), restriction, updating, rectification, portability, and objection to the processing of your personal data, as well as, in general, you can exercise all the rights provided for in Articles 15, 16, 17, 18, 19, 20, 21, and 22 of the GDPR.

### **EU Regulation 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subject**

1. The data subject has the right to obtain confirmation of the existence or non-existence of personal data concerning them, even if not yet recorded, their communication in an intelligible form, and the possibility to lodge a complaint with the supervisory authority.

2. The data subject has the right to obtain:

- a. Information on the origin of personal data;
- b. The purposes and methods of processing;
- c. The logic applied in case of processing carried out with the aid of electronic instruments;
- d. The identification details of the data controller, data processors, and the designated representative pursuant to Article 5, paragraph 2;
- e. The subjects or categories of subjects to whom personal data may be communicated or who may become aware of it as designated representatives in the territory of the State, data processors, or authorized personnel.

3. The data subject has the right to obtain:

- a. Updating, rectification, or, when interested, integration of data;
- b. The erasure, transformation into anonymous form, or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
- c. Certification that the operations referred to in letters a) and b) have been notified, also as regards their content, to those to whom the data were communicated or disclosed, except in the case where such fulfillment proves impossible or involves a use of means manifestly disproportionate to the protected right;
- d. Data portability.

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

a. For legitimate reasons, to the processing of personal data concerning them, even if pertinent to the purpose of the collection;

b. To the processing of personal data concerning them for the purpose of sending advertising materials or direct sales or for carrying out market research or commercial communication.