

COMPANY VIDEO SURVEILLANCE

POLICY AND INFORMATION FOR INTERESTED PARTIES

This document describes the company policy on video surveillance from the point of view of management and protection of personal data. It contains the INFORMATION, i.e. the information to be provided mandatorily and transparently in compliance with art. 13 of Regulation (EU) 2016/679, (of hereinafter "GDPR") and art. 4 of Law no. 300/1970 (hereinafter "Workers' Statute").

DATA CONTROLLER AND OTHER SUBJECTS OF THE PROCESSING

The Data Controller of the processing of the personal data collected through the video surveillance system is RAIPLAST S.r.l. (hereinafter "Company"), with registered office in Via Maggiore 17/A, San Polo di Piave (TV), which can be contacted at the following e-mail address: info@raiplast.it.

THE VIDEO SURVEILLANCE SYSTEM AND ITS PURPOSE

Our video surveillance responds to the need and opportunities for the safety of activities, the protection of assets - of the Company, of employees and collaborators, of visitors and guests for various reasons - and of the safety of the people who work and/or are in our areas. The filming and recording system is designed both for the purpose of preventing unlawful acts and malicious events (theft, damage and vandalism, other offenses against people or property), both for investigation purposes on injurious or harmful acts or facts.

The camera systems are located at the entrances to the perimeter and to the buildings, in various points of the properties and in their pertinent areas. In some environments and areas, work activities or activities related to them are held or may be held, and therefore may be subject to video recording (images in real time "live" and/or recorded, depending on the cases described in the policy), always strictly in compliance with the purposes and in the manner indicated in this document.

PURPOSE AND LEGAL BASIS OF DATA PROCESSING IN COMPLIANCE WITH GDPR

- for the protection of company assets, employees and third parties;
- purposes related to the need to increase the safety of the people in the structure towards assaults or threats;
- purposes of investigation or judicial inquiry by legitimate public entities (law enforcement agencies and investigating judicial authority);
- for the purpose of preventing acts against public safety and/or deterrence against crimes or actions of potential disruption of public service, etc.

The legal basis - i.e. what makes the processing lawful even in the absence of consent - is the company need to carry out the processing itself for the pursuit of the legitimate interest corresponding to the aforementioned purposes.

PRINCIPLES AND METHODS OF PROCESSING

Any processing of personal data will take place in compliance with the principles indicated by art. 5 of the GDPR (lawfulness, correctness, transparency, adequacy, relevance, necessity, and proportionality), as well as in compliance with the provisions of article 4, paragraph III, of the Workers' Statute.

The cameras and the recording system are able to identify the people filmed, in all conditions of light (day and night) and serve to protect the physical safety of the people present in these places: employees, collaborators and visitors; they serve to preserve the orderly and safe conduct of the activities carried out in the perimeter, as well as to protect the Data Controller's real estate and movable properties located on site, which may belong both to the Company and to other subjects, including our visitors.

The system operates 24/7 with image recording.

Recordings take place on company servers and computer media and are managed with IT tools.

DATA RETENTION

The images are kept for a time no longer than that necessary in relation to the purposes described above and in any case not exceeding 48 hours, except in the cases of particular justifiable needs for prolonged conservation, as well as in cases where specific request from legitimate subjects should be received.

Once the maximum conservation term has elapsed, the system automatically deletes the images.

PROVISION OF DATA AND CONSEQUENCES ON FAILURE TO PROVIDE

The provision of data is inherent in access to filmed areas and, therefore, it is necessary. Before entering the visual cone of cameras, the passer-by is warned by means of specific signs that he is entering an area under video surveillance: therefore, if he does not want to be filmed, he must refrain from entering the area.

CATEGORIES OF THE RECIPIENTS OF THE DATA

Personal data will be processed by internal figures authorized by the Company as Data Controller by reason of the respective duties and according to the profiles attributed to them, as well as to the following categories of external subjects, according to the various purposes above described and the processing activities to be performed:

- System maintainers, who can also intervene remotely
- professionals or consulting companies;
- Judicial authority;
- law enforcement,
- insurance companies;
- subjects to whom the communication is required for the fulfillment of regulatory obligations.

Those, among the external subjects mentioned above, who process personal data on behalf of the Data Controller, are nominated Responsible for the processing with formal act.

RIGHTS OF THE INTERESTED PARTIES

In relation to the Data Controller, the interested parties (the persons subject to filming and recordings) enjoy the rights granted to them by the GDPR (articles from 15 to 22) and therefore, if the respective conditions are met, they have the right to request access to their personal data, to their cancellation or to the limitation of their processing.

To exercise your rights and for any other matter relating to the processing of your personal data, each interested parties can contact the Company by writing to the following e-mail address: info@raiplast.it.

Each interested party also has the right to lodge a complaint with the Guarantor for the protection of personal data: www.garanteprivacy.it.

TRANSFER OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

The recordings will not be transferred to third countries, i.e. non-European, or to international organizations.

USE OF IMAGES CONCERNING WORKERS

The video surveillance system has been subjected to the authorization from the Treviso Territorial Labor Inspectorate issued on 24/05/2021 in compliance with art. 4, paragraph I of Law no. 300/1970, as updated by art. 23 of Legislative Decree no. 151/2015.

With this Company Policy, the Company intends to fulfill, in addition to an obligation towards all interested parties and visitors to the facility in general, including the obligation to provide information to the workers, in compliance with art. 4, paragraph III of Law no. 300/1970, regarding the methods of use of the video surveillance: the images collected through the video surveillance system can be used to carry out checks aimed at ascertaining crimes or other offences, as well as, in compliance with the conditions indicated in art. 4, paragraph III of Law no. 300/1970 (as updated by art. 23 of Legislative Decree no. 151/2015), for all purposes related to the management of the employment relationship.

REVISIONS AND UPDATES OF THE SYSTEM AND OF THE POLICY

Any update of the system of video surveillance will result in the revision of this document and any further fulfillment connected to the provisions of the Workers' Statute and the current regulations on personal data protection. In particular, further administrative authorization may be required to the competent Territorial Labor Inspectorate and adequate and timely information will be given to employees, also with additional posting on the bulletin board.