

PRIVACY POLICY STATEMENT ON VIDEO SURVEILLANCE SYSTEM
pursuant to art. 7 GDPR, Regulation (EU) 2016/679
(Ref. PRV2021062901R1-EN)

LATI Industria Termoplastici S.p.A. (hereinafter, LATI) - data controller according to the Regulation of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data (GDPR UE 2016/679) - herewith communicates that, pursuant to art. 13 of the above Regulation, some areas of the production plants of Vedano Olona and Gornate Olona are monitored by a video surveillance system duly indicated with appropriate signs as requested by the Italian Data Protection Authority.

1. Types of data subject to the processing

The data consists of recorded footage in areas under video surveillance.

2. Legal basis for the processing

The legal basis for the processing is the legitimate interest of the employer. The legal basis is the subject of an agreement between the employer and trade unions pursuant to art. 4 of the Italian law 300/1970 and is precisely:

- i. The collection of evidence;
- ii. The protection of people and property against aggressions, thefts, robberies, damages, acts of vandalism;
- iii. Fire prevention or workplace safety purposes.

3. Data processing purpose

The images are acquired and stored by LATI in order to prevent illegal activities, to ensure the safety of the sites, the protection of the company's assets and the prevention of fires as well as for workplace safety purposes. The system adopted does not link, cross or compare the images collected with other personal data or with any ID codes. The data are processed based on the principles of correctness, lawfulness, transparency and protection of the privacy and rights of the data subjects. The use of images for other purposes, in particular the remote surveillance of working activities, is excluded.

4. Data processing method

The processing of data for the above purposes is undertaken with automated methods, on electronic or magnetic supports, in compliance with the confidentiality and security rules by law, the consequent regulations and the company's internal provisions.

According to the law, the shot angle and the overview are aptly designed for limiting, as far as possible, the angle of view to the areas to be actually protected and avoiding other areas.

5. Data processing location

The data are processed and stored at the company's registered office (via Baracca 7, Vedano Olona (VA), Italy) and at the production plant of Via delle Industrie 1, Gornate Olona (VA), Italy.

6. Categories of data recipients

The data processed will not be disclosed to third parties. In any case, other entities may become aware of the data in relation to the data processing purpose as above:

- Entities that can access the data according to Union or Member State law to which the Data Controller is subject;
- Company employees, provided that they are previously designated as operators acting under the authority of the Data Controller, in accordance with art. 29 GDPR, or as a System Administrator;
- Human Resource employees as well as the trade union representatives responsible for viewing the footage together with those referred to at the previous point.

- Operators (surveillance equipment maintenance companies) who carry out activities within the European Union – as Data Processors appointed by LATI – supporting the operations and services referred to in paragraph 3.

7. Disclosure of personal data

The transfer to external parties of the images recorded on IT support can only take place upon formal request by the competent authorities such as the Judicial Authorities and the Police.

8. Transfer of data abroad

The Data Controller will not transfer the data to a third country or international organisation.

9. Data storage period

The Data Controller stores the images from the video surveillance system for a period of time not exceeding the time strictly necessary to achieve the data processing purpose. LATI will destroy the data collected within 72 hours, without prejudice to special needs for further storage in relation to holidays or to the closure of offices or of other activities. In this case, or if it is necessary to respond to a specific request from the Judicial Authority or the Police, the storage may be extended by a period not exceeding seven days.

10. Rights of the data subject

With regard to personal data, the Data Subject may exercise at any time the rights provided for in CHAPTER III of the Regulation (EU) 2016/679. In particular, the Data Subject has the right to ask the Data Controller for access to his personal data, the erasure of personal data, the restriction of processing, the right to lodge a complaint with the Data Protection Authority, as well as to exercise any other rights recognised under the applicable regulations.

11. Data Controller and Data Protection Officer

The Data Controller is LATI Industria Termoplastici S.p.A. registered office: via F. Baracca n. 7, Vedano Olona (VA), Italy.

You are informed that, pursuant to art. 37 GDPR, Regulation (EU) 2016/679, the company has appointed a Data Protection Officer.

For any further information, please contact: privacy@it.lati.com.

Vedano Olona, 29 June 2021