

NOTICE ON THE PROCESSING OF PERSONAL DATA IN RELATION TO VIDEO SURVEILLANCE (PURSUANT TO ART. 13 OF EU REG. NO. 679/2016)

This notice, pursuant to and for the purposes of Art. 13 of Regulation (EU) 679/2016 (hereinafter: GDPR), as well as the Italian Data Protection Authority's (Garante della Privacy) measure on video surveillance of 08/04/2010 and the EDPB guidelines on video surveillance adopted on 29 January 2020, aims to inform you of the methods by which your personal data are processed, collected and processed through the video surveillance systems operating at the premises of Dominoni S.r.l., in compliance with the applicable regulations on personal data protection.

This notice supplements the content of the simplified notice provided by means of appropriate pictograms displayed in video-surveilled areas, positioned before the field of view of the cameras and clearly visible under all ambient lighting conditions.

1 Data Controller and Contact Details

The Data Controller for the personal data covered by this notice is Dominoni S.r.l., with registered office at Strada Provinciale 12 3 – 26010 Camisano (CR) - VAT number 00749460192, e-mail dominonisrl@pec.it.

2 Types of Data Collected and Description of Processing

The Data Controller's premises operate technological systems that may collect and process personal data of Data Subjects. The video surveillance systems operate 24 hours a day, 7 days a week, including public holidays, and allow real-time viewing and recording of images. The cameras, marked by appropriate pictograms (simplified notices), are positioned outside the company premises (in common areas and not at workstations) and along the external perimeter. Such devices, which may capture the image of the data subject, are used in a manner that limits the field of view of the video-surveilled area to the specified purposes only.

3 Purposes of Processing

The purposes of processing personal data carried out through video surveillance systems are:

- the prevention and management of unlawful acts or dangerous situations for staff or third parties;
- the protection of company assets and property and the prevention of unauthorised access by third parties into areas under the Controller's jurisdiction;
- the pre-constitution of evidence in the event of occurrences that may entail liability on the part of the Controller or third parties, and the response to requests from competent Authorities in the context of investigative activities;
- the protection of health and safety in the workplace;
- organisational, production and service delivery requirements.

The very presence of cameras serves as a preventive and deterrent tool and also allows, where possible, the intervention of authorised personnel.

The Controller reserves the right to retain significant footage in the event of occurrences falling within the aforementioned processing purposes, with a view to acquiring significant evidence for the exercise of its legitimate interests.

In any event, the processing of personal data to meet the needs relating to the exercise of the right of defence of the Controller or third parties, in any judicial proceedings, based on images collected by the cameras, is reserved.

The video surveillance system may not be used to carry out remote monitoring of workers, in compliance with Art. 4 of the Workers' Statute.

4 Legal Basis for Processing

The legal basis for the processing of personal data carried out through the video surveillance system, pursuant to Art. 6(1)(f) of EU Reg. No. 2016/679, is the pursuit of the legitimate interests of the Data Controller for the aforementioned purposes.

5 Methods of Data Processing and Retention Periods

Data collected through the video surveillance system are processed using computer and telematic tools in accordance with the principles of lawfulness, fairness and transparency. Processing is carried out through organisational methods and with logic strictly related to the stated purposes.

The Data Controller has implemented technical and organisational measures to provide an adequate level of security and confidentiality for personal data. These measures take into account the state of the art in technology, the costs of implementation, the nature of the data and the risks associated with their processing. The aim is to protect data from accidental or unlawful destruction or alteration, accidental loss, unauthorised disclosure or access, and other forms of unlawful processing

For the above-mentioned purposes only, images captured by the cameras are viewed in real time exclusively through dedicated monitors by authorised personnel, authorised by the Data Controller, and are subject to recording and/or storage.

Images are retained for 48 hours, subject to special requirements for extended retention in relation to public holidays or company closures. The Controller may extract significant footage where it is necessary to comply with a specific investigative request from the Judicial Authority or judicial Police, concerning unlawful acts or criminal offences, requests for the judicial protection of rights, or events otherwise falling within the processing purposes. For such significant footage, the retention period follows the two-year short judicial prescription period. Significant footage subject to ongoing investigations or related to the exercise of a right in judicial proceedings may be retained for longer, until the conclusion of the proceedings. Once these periods have elapsed, data are deleted definitively and securely.

The personal data collected will not be subject to any automated decision-making process, including profiling.

6 Disclosure of Data.

Personal data may be disclosed, exclusively for the purposes specified above, to:

- Companies or professionals, formally identified as Data Processors pursuant to Art. 28 of the GDPR, engaged by the Controller in connection with the processing of personal data covered by this notice, and tasked with supervision or maintenance of the video surveillance system, within the limits of contractually agreed activities;
- Competent Authorities, upon formal request and within the limits provided by law, in the event of criminal offences or investigations;
- insurance companies, for the protection of rights and the handling of claims for damages.

The data processed will not be disseminated, disclosed or transferred outside the European Union.

7 Rights of the Data Subject

The data subject, i.e. the natural person to whom the personal data relate, has the right to request from the Data Controller access to their personal data, its rectification or erasure, as well as to request its restriction or to object to its processing. The data subject also holds the right to data portability. To exercise these rights, please refer to the contact details indicated in this notice. All requests received will be handled and responded to in accordance with the applicable regulations, including with regard to whether the conditions for granting them are actually met. In the absence of such conditions, the Data Controller may not act on the requests. The Data Controller makes every effort to respond to legitimate and well-founded requests within one month of receipt. Depending on the complexity and number of requests, and in light of the above, this period may be extended by a further two months. Upon conclusion of the handling of the request, and against the decision made thereon, the data subject has the option to lodge a complaint with the supervisory authority (www.garanteprivacy.it) and to seek judicial redress. These rights may be exercised by sending an e-mail to the Controller's e-mail address indicated above.

This Notice was last updated on 06/02/2026, and may be subject to periodic revision, including in relation to applicable legislation and case law.