

PRIVACY POLICY ABOUT VIDEO SECURITY SYSTEM INSTALLED IN THE BP DECOLLETAGE SRL HEADQUARTERS

According to art. 14 of the EU Regulation (Regulation for protection of personal data) and to what established by general measure about video security system published the 8th of April, 2020 and adopted by Guarantor for the protection of personal data, and by rules for processing of personal data about video security system n. 3/2019 adopted by the European committee, we communicate the following information:

Categories of processing data and purpose of processing

The personal data Processing – images of the video security system - will concern BP Decolletage SRL employees, external consultants and/or its collaborators, visitors of the Company headquarters located in Via Luciano Lama n. 15, 63078 Spinetoli (AP), and /or anyone who will access to areas where cameras have been installed.

Specifically, BP DECOLLETAGE SRL has installed a video security system in its headquarters located in Via Luciano Lama n. 15, 63078 Spinetoli (AP) according to the above mentioned law – with reference to measures adopted by authorities – as well as what established by art. 4 law 300/1970 (Workers' Statute). The Company has installed a video security system with many detection devices – whose presence is reported on specific signs located in video security areas (on the walls) – for the following purposes:

- To Guarantee security, protection and integrity of Company's real estate and movable property;
- To Protect production needs as the Company uses machines and plants that have to be monitored in a continuous cycle.
- To Guarantee the occupational safety code, as the BP Decolletage SRL is a "metalmecanica" Company (CCNL Metalmeccanica Industria) many dangerous activities could be occur, so there is the need to guarantee fast operations rescue in case of accident.

Then, we specify that the video security system has been installed according to the company labour union, as well as according to what established by art. 4 law 300/1970 about the prohibition of use of images to control work activities by remote.

Legality basis

The Personal data Processing legal basis of the video security system is the legitimate interest that has BP Decolletage SRL (owner of the processing) under art. 6, (lett. f) of GDPR to guarantee need as mentioned above.

Way of processing

Personal data (images take by cameras) of the video security system will be used only for pursuing the written purposes and according to the principles of necessity, lawfulness, transparency, correctness as well as the principles of limitation of processing and storage in compliance with the legislation on the protection of personal data (Privacy).

Processing of personal data will be made using a system of professional hardware and software elements, active 24 hours a day, that will work according to the above mentioned purposes and to guarantee privacy of personal data.

Data retention period

Respecting the Guarantor for the protection of personal data for the processing of personal data about video security system, recorded personal data will be retained for a period of 24 hours after the detection, with the exception for special needs for weekends, festivity or closure of offices, in these cases images will be retained no more than 48 hours, as well as if the Company has to answer to particular investigative requests and of Judicial Authority or Judicial Police, after which images and data will overlap with the previous ones, deleting them.

In addition, we specify that:

- Recorded data will not be associated and/or interconnected with other IT systems;
- The plant is made by nr. 18 video cameras marked by special signs (simplified information);
- There isn't any direct connection with the police and therefore it will not be possible to view images in real time from a remote location;
- Images can be viewed only by specially authorized personnel as specified in the company agreement on video security system and in the technical report and in any case the authorized personnel has to maintain confidentiality about personal data processed (viewing of images taken by cameras).

Recorded personal data will be retained for a period of 24 hours after the detection, with the exception for special needs for weekends, festivity or closure of offices, in these cases images will be retained no more than 48 hours, as well as if the Company has to answer to particular investigative requests and of Judicial Authority or Judicial Police, after which images and data will overlap with the previous ones, deleting them.

On request of the Judicial Authority or the Judicial Police, only the images useful for the search of responsible will be poured, by the Data Processor, on a new computer support, to their conservation in relation to the offenses or investigations.

For other questions relating to the video surveillance system, please refer to the technical report and the labour union agreement as well as to the attached documents.

BP DECOLLETAGE S.R.L.

Communication

The collected and recorded data will neither be communicated nor disseminated, with the exception in the case in which they - as specified above – will be subject of a specific request by the Public Security Authority and/or the Judicial Police bodies.

Rights of the interested parties

The interested parties at the processing - BP Decolletage SRL employees, external consultants and/or its collaborators, visitors of the Company headquarters located in Via Luciano Lama n. 15, 63078 Spinetoli (AP), and /or anyone who will access to areas where cameras have been installed – can exercise rights as in articles 15 et seq. of EU Regulation 679/2016 compatibly with nature and type of data processed (images taken by cameras).

For other information about rights that you can exercise regarding the Video Surveillance, please refer to proceedings and/or guidelines adopted by national and European supervisory authorities.

To exercise the rights listed above, interested people have to submit a specific request contacting the owner of processing personal data of BP DECOLLETAGE S.R.L., in the person of the legal representative pro-tempore Ballatori Stefania, at the administrative offices located in Via Luciano Lama n. 15, 63078 Spinetoli (AP) or by sending the related requests to the following addresses:

- via certified e-mail: bpdecolletage@legalmail.it
- via registered letter: Via Luciano Lama n. 15, 63078 Spinetoli (AP) (for information call: Tel 0736 899161)

Data controller

The owner of personal data processing is BP Decolletage SRL, in the person of the legal representative VAT NUMBER, TAX CODE 02065150449, VIA LUCIANO LAMA N. 15, 63078 SPINETOLI (AP).

Mail address: bpdecolletage@legalmail.it;
Address: Via Luciano Lama n. 15, 63078 Spinetoli (AP).
Tel 0735 899161.

Processing place

Data processing operations take place at the above mentioned headquarters of the Data Controller and are carried out only by authorized/appointed personnel and in specially guarded rooms.

For more information about processing of personal data, please refer to the Company Regulations for Video Surveillance, and to the policy for employees and consultants, a document published on the company website.

Spinetoli, 16/03/2023

BP DECOLLETAGE S.R.L.

Sede legale e operativa: Via Luciano Lama, 15 - 63078 Spinetoli (AP)
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