
Information pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR)

We wish to inform you that Regulation (EU) 2016/679 ("General Data Protection Regulation") provides for the protection of individuals and other entities with regard to the processing of personal data.

Pursuant to Articles 13 and 14 of the Regulation, we hereby provide the following information:

1. Purpose and Legal Basis of the Processing

For security purposes outside Télefo S.p.A., surveillance cameras have been installed which inevitably collect the personal data (images) of anyone entering the camera's field of view. The monitored areas are clearly indicated by signs placed outside the cameras' operating range.

The purpose of the signage is to inform data subjects in advance that, once they cross the indicated boundary, their image will be recorded.

The legal basis for the processing of personal data (images) is the data subjects' explicit consent, expressed when, after reading the warning signs, they choose to enter the cameras' field of view.

2. Processing Methods

For the purposes indicated above, your data are processed electronically. Processing operations are carried out in a manner that ensures the logical and physical security and confidentiality of your personal data.

3. Nature of Personal Data

The personal data processed consist of images captured by surveillance cameras. Consent for such processing is deemed to have been provided when you cross the boundary indicated by the warning signs placed outside the surveillance area.

4. Mandatory or Optional Nature of Data Provision

The provision of your personal data is mandatory in order to access the building where the company of the Data Controller identified in Section 7 of this notice is located.

5. Scope of Communication and Disclosure of Data

Your data may be disclosed to:

- All parties granted access to such data by law or regulatory provisions;
- Our duly trained employees and collaborators authorized to process the data in question, as well as the Data Processor appointed pursuant to Article 28 of Regulation (EU) 2016/679, to whom the CCTV service has been outsourced;
- Law enforcement authorities and any natural or legal persons, public or private, necessary for filing complaints or reports in the event of suspected civil or criminal violations.

6. Storage Method and Retention Period of Personal Data

The images are recorded and stored on the DVR (recording device) and retained for a maximum period of 24 hours. After this period, they are automatically deleted through overwriting, except



where longer retention is required due to public holidays, company closures, or specific investigative requests from judicial authorities.

7. Identification of the Data Controller

Data Controller:

Télefo S.p.A.

Via Raffaello Sanzio 12

20060 Trezzano Rosa (MI), Italy

Email: sales@telefo.com

PEC: telefo@lamiaptec.it

8. Rights of the Data Subject

8.1 Right of Access and Rectification (Articles 15 and 16 GDPR)

The data subject has the right to obtain confirmation from the Data Controller as to whether personal data concerning them are being processed and, where that is the case, access to the personal data and the following information:

- a) The purposes of the processing;
- b) The categories of personal data concerned;
- c) The recipients or categories of recipients to whom the personal data have been or will be disclosed, particularly recipients in third countries or international organizations;
- d) The envisaged period for which the personal data will be stored or, if not possible, the criteria used to determine that period;
- e) The existence of the right to request rectification or erasure of personal data, restriction of processing, or to object to processing;
- f) The right to lodge a complaint with a supervisory authority;
- g) The existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and expected consequences of such processing for the data subject.

8.2 Right to Erasure ("Right to be Forgotten") – Article 17 GDPR

The data subject has the right to obtain from the Data Controller the erasure of personal data concerning them without undue delay where one of the following grounds applies:

- a) The personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- b) The data subject withdraws consent on which the processing is based and there is no other legal ground for processing;
- c) The data subject objects to processing and there are no overriding legitimate grounds for continuing the processing;
- d) The personal data have been unlawfully processed;
- e) The personal data must be erased to comply with a legal obligation under Union or Member State law;
- f) The personal data were collected in relation to the offer of information society services referred to in Article 8(1) GDPR.

8.3 Right to Restriction of Processing – Article 18 GDPR

The data subject has the right to obtain restriction of processing where one of the following applies:



- a) The accuracy of the personal data is contested, for a period enabling the Data Controller to verify their accuracy;
- b) The processing is unlawful and the data subject opposes erasure and requests restriction of use instead;
- c) The Data Controller no longer needs the personal data for processing purposes, but they are required by the data subject for the establishment, exercise, or defense of legal claims;
- d) The data subject has objected to processing pursuant to Article 21(1) GDPR pending verification of whether the legitimate grounds of the Data Controller override those of the data subject.

8.4 Right to Data Portability – Article 20 GDPR

The data subject has the right to receive the personal data concerning them, which they have provided to a Data Controller, in a structured, commonly used, and machine-readable format and has the right to transmit those data to another Data Controller without hindrance.

9. Withdrawal of Consent

You have the right to withdraw your consent to the processing of your personal data by sending an email to one of the addresses indicated in Section 7 of this notice, together with a copy of your identity document, including the following statement:

"Withdrawal of consent to the processing of all my personal data."

Following receipt of the request, your personal data will be removed from the archives as soon as possible.

If you require further information regarding the processing of your personal data or wish to exercise any of the rights described in Section 8 above, you may send an email to one of the addresses listed above.

Before providing or modifying any information, it may be necessary to verify your identity and ask you certain questions. A response will be provided as soon as possible.

