

## **PRIVACY NOTICE ON VIDEO SURVEILLANCE AND ACCESS CONTROL**

Open Fiber S.p.A., with registered office at Largo Guido Donegani 2 – 20121 Milan, Italy, VAT Number 09320630966, in its capacity as Data Controller of personal data (hereinafter “Controller” or “Open Fiber”), hereby informs you, pursuant to Articles 13 and 14 of EU Regulation No. 2016/679 (hereinafter also referred to as the “General Data Protection Regulation” or “GDPR”), that your personal data (hereinafter “Data” or “the Data”) may be processed as described below and for the purposes indicated herein.

### **Purpose and Legal Basis of the Processing**

The data present on the identity document you provided will be processed for the following purposes:

- a) issuance of a personal badge upon your entry to Open Fiber premises;
- b) access control within company facilities;
- c) security requirements.

The legal basis for the processing is identified (by way of example) in your possible explicit consent to the processing of the data, and in the necessity for the Data Controller to comply with specific security obligations.

### **Personal Data Subject to Processing**

The Data in question concerns all the Data contained in your identity document.

### **Data Retention Period**

The Data provided will be retained for as long as necessary to achieve the purposes indicated above and for the period required by applicable laws and regulations.

### **Data Processing Methods**

The processing of Data is carried out using paper-based supports and electronic tools with measures suitable to ensure the security and confidentiality of the Data, aimed at preventing unauthorized access, loss, or destruction, in compliance with the provisions of Chapter II (Principles) and Chapter IV (Controller and Processor) of the GDPR. The Data may be processed by authorized internal or external parties committed to confidentiality.

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## **Scope of Data Disclosure**

The Data may also be processed by third-party companies acting on behalf of the Controller, in their capacity as external data processors (by way of example and not exhaustive: credit institutions, professional firms, suppliers/consultants who manage and/or participate in the management and/or maintenance of the electronic and/or telematic tools used by us, insurance companies providing insurance services, for the time strictly necessary to optimally perform such services).

Your Data will be accessible only to those within the company who require it in relation to the performance of their duties or hierarchical position. Such individuals will be properly instructed to prevent loss, destruction, unauthorized access, or unauthorized processing of the Data.

Without your explicit consent (pursuant to art. 6, letters b) and c) of the GDPR), the Controller may communicate your Data to supervisory bodies, judicial authorities, as well as any other parties to whom communication is mandatory by express legal provision.

## **Nature of Data Provision**

We remind you that, with regard to the purposes indicated, the provision of your Data is mandatory. Any refusal on your part will result in the inability to issue the badge and the impossibility to access Open Fiber premises.

## **Data Disclosure**

Your Data will be shared between the Data Controller and the duly appointed Data Processors for the execution of the activity.

## **Data Transfer Abroad**

The Data will not be transferred outside the European Union or the European Economic Area. However, it is understood that the Data Controller, if necessary, may relocate the servers to countries outside the EU. In such cases, the Data Controller hereby ensures that any transfer of Data outside the EU will be carried out in compliance with Articles 44 et seq. of the GDPR and applicable legal provisions, including, where necessary, the execution of agreements that guarantee an adequate level of protection.

## **Video Surveillance**

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Pursuant to Article 3.1 of the General Provision of the Data Protection Authority on Video Surveillance dated 29/04/2004 and the General Provision on Video Surveillance dated 08/04/2010, we inform you that a video surveillance system is active for the purpose of monitoring access and areas subject to specific risks. Since these are automatic and generalized recordings, anyone entering the surveilled areas cannot avoid being recorded. The recordings are solely intended to ensure the safety of personnel and any third parties, to protect company assets, and to help identify potential offenders, thus facilitating the protection of violated rights in case of unlawful acts.

Through the aforementioned video surveillance system, personal data relating to you, represented by your images, may also be processed. For this purpose, we inform you that the processing of data collected by the cameras is carried out in compliance with the provisions of the above-mentioned General Provisions on video surveillance. The data collected are not disclosed or disseminated and are retained only for the time strictly necessary to achieve the above-mentioned purposes and in compliance with applicable laws.

#### **Data Controller and Data Protection Officer**

The Data Controller is Open Fiber S.p.A., a single-member company subject to the direction and coordination of Open Fiber Holdings S.p.A., with registered office at Largo Guido Donegani 2 – 20121 Milan, Italy, VAT number, tax identification number and registration number in the Milan Companies Register 09320630966, contactable via the following e-mail address: [privacy@openfiber.it](mailto:privacy@openfiber.it).

Open Fiber has appointed the Data Protection Officer (DPO) pursuant to Article 37 of the GDPR, who can be contacted at the following e-mail address: [dpo.of@openfiber.it](mailto:dpo.of@openfiber.it).

#### **Exercise of Rights**

We inform you that, as the Data Subject (“Data Subject”) regarding the processing of your personal data, you have the right to exercise the rights provided for under the GDPR, specifically: a) the right, pursuant to Article 15, to obtain confirmation as to whether or not personal data concerning you are being processed and, if so, to access such data and the following information: i) the purposes of the processing; ii) the categories of personal data concerned; iii) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular if recipients are third countries or international organizations; iv) where possible, the envisaged period

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for which the personal data will be stored or, if not possible, the criteria used to determine that period; v) the existence of the right of the Data Subject to request from the Data Controller rectification or erasure of personal data or restriction of processing or to object to such processing; vi) the right to lodge a complaint with a supervisory authority pursuant to Articles 77 et seq. of the GDPR; vii) where the personal data are not collected from the Data Subject, any available information as to their source; viii) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR, and, at least in those cases, meaningful information about the logic involved as well as the significance and the envisaged consequences of such processing for the Data Subject; ix) the right to be informed about the existence of appropriate safeguards pursuant to Article 46 of the GDPR relating to the transfer, where applicable, of personal data to a third country or an international organization. b) The Data Subject shall also have, where applicable, the possibility to exercise the rights set forth in Articles 16-21 of the GDPR (right to rectification, right to erasure, right to restriction of processing, right to data portability, and right to object). We inform you that Open Fiber undertakes to respond to your requests no later than one month from receipt of the request. This time limit may be extended depending on the complexity or number of requests, and Open Fiber will inform you of the reasons for such extension within one month from your request. The outcome of your request may be provided in writing, either on paper or electronically.

## **Methods for Exercising Rights**

The Data Subject may exercise the aforementioned rights at any time and request the updated list of Data Processors by submitting a request to the following e-mail addresses: [privacy@openfiber.it](mailto:privacy@openfiber.it) or [dpo.of@openfiber.it](mailto:dpo.of@openfiber.it). Should you believe that the processing of your personal data violates the provisions of the Regulation, you have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali), as provided for under Article 77 of the GDPR, or to seek judicial remedies pursuant to Article 79 of the GDPR, following the procedures and guidelines published on the Authority's official website: [www.garanteprivacy.it](http://www.garanteprivacy.it).

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