



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

Open Fiber S.p.A., with registered office in Viale dell’Innovazione n. 1 – 20126 Milan, MI, Italy, VAT No. 09320630966, in its capacity as Data Controller (hereinafter referred to as “Data Controller” or “Open Fiber”), informs you, pursuant to Article 13 EU Regulation No. 679/2016 (hereinafter also “General Data Protection Regulation” or “GDPR”) that your personal data (hereinafter referred to as “Data” or “the Data”) provided through the above form may be processed in the manner and for the purposes indicated below.

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

The Data from your identity document, provided by you, will be processed for the following purposes: a) issuance of a personal badge for entry to Open Fiber premises; b) Access control to company premises; c) Security requirements.

The legal basis for the processing includes, by way of example, your explicit consent to the processing of the Data, as well as the necessity for the Controller to meet specific security obligations.

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

In particular, the Data in question includes all the information contained in your identity document.

### **Data Retention Periods**

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

### **How Data Are Used**

The processing of Data is carried out using both paper and electronic means, with appropriate measures in place to ensure the security and confidentiality of the Data, in compliance with the provisions of Chapter II (Principles) and Chapter IV (Data Controller and Data Processor) of the GDPR. Data may be processed by internal or external individuals who are specifically authorised and bound by a confidentiality obligation.

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### **Scope of Data Circulation**

The Data may also be processed by third-party companies that perform activities on behalf of the Data Controller, acting as External Data Processors (for example, credit institutions, professional firms, suppliers or consultants who manage and/or assist in the management or maintenance of the electronic and/or telematic tools we use, insurance companies that provide insurance services, for the time strictly necessary to ensure optimal service performance). Your Data will only be accessible to staff members of the Company who require it to perform their roles or duties within the organisation. Such personnel will be appropriately instructed to prevent the loss, destruction, unauthorised access, or improper processing of the Data.

Without your explicit consent, the Data Controller may disclose your Data to supervisory authorities, judicial bodies, and any other entities to which disclosure is mandatory under the law (pursuant to Art. 6(b) and (c) of the GDPR).

### **Nature of Provision**

We remind you that, with reference to the purposes outlined above, the provision of Data is mandatory. If you refuse to provide the Data, your badge will not be issued, and you will not be able to access Open Fiber sites.

### **Data Dissemination**

Your Data will not be disclosed to any unspecified persons.

### **Transfer of Data abroad**

Data will not be transferred outside the European Union. However, the Data Controller reserves the right, if necessary, to relocate servers to countries outside the EU. In such cases, the Data Controller ensures that any transfer of Data outside the EU will be carried out in compliance with Articles 44 and following of the GDPR, as well as other applicable legal provisions, by entering into agreements that guarantee an adequate level of protection, if required.

### **Video Surveillance**

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Pursuant to Article 3.1 of the General Provision on Video Surveillance issued by the Data Protection Authority on 29 April 2004 and the General Provision on Video Surveillance of 8 April 2010, we inform you that a video surveillance system is in operation for the purpose of monitoring access and areas subject to potential risks. As this system involves automatic and generalised recording, individuals entering video-surveilled areas cannot avoid being filmed. The sole purpose of this surveillance is to ensure the safety of staff and third parties, protect the company's assets, and assist in identifying perpetrators of offences, thereby facilitating the protection of violated rights in the event of unlawful actions.

Through the above-mentioned video surveillance system, Data concerning you, in the form of your images, may also be processed. We inform you that the processing of Data collected via the cameras is conducted in accordance with the provisions of the above-mentioned General Provisions on video surveillance. The Data collected will not be disclosed or shared and will be retained only for as long as is strictly necessary to achieve the aforementioned purposes, in compliance with applicable laws and regulations.

- **Data Controller and Data Protection Officer**

The Data Controller is Open Fiber S.p.A., with registered office in Viale dell'Innovazione n. 1 – 20126 Milan, MI, Italy, VAT No. 09320630966.

Open Fiber has appointed a Data Protection Officer (DPO) in accordance with Article 37 of the GDPR, who can be contacted at the following address: [dpo.of@openfiber.it](mailto:dpo.of@openfiber.it).

### **Exercise of Rights**

We inform you that, as a Data Subject ("Data Subject"), you have the right to exercise your rights under the GPDR, including the following:

1. a) The right, pursuant to Article 15 of the GDPR, to obtain confirmation as to whether or not Data concerning you is being processed and, if so, to access the Data and the following information: i) The purposes of the processing; ii) The categories of Data concerned; iii) The recipients or categories of recipients to whom the Data has been or will be disclosed, particularly if these recipients are in third countries or

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international organisations; iv) Where possible, the expected retention period of the Data or, if not possible, the criteria used to determine this period; v) The existence of the Data Subject's right to request rectification or erasure of the Data from the Data Controller, restriction of its processing, or objection to its processing; vi) The right to lodge a complaint with a supervisory authority, pursuant to Articles 77 and following of the GDPR; vii) Where the Data was not collected directly from the Data Subject, all available information about its source; viii) The existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR, and meaningful information about the logic involved, as well as the significance and expected consequences of such processing for the Data Subject; ix) The right to be informed of the existence of adequate safeguards, pursuant to Article 46 of the GDPR, concerning the transfer of Data, if the Data is transferred to a third country or international organisation.

2. b) The Data Subject shall also have the right (where applicable) to exercise their rights under Articles 16-21 of the GDPR, including the Right to rectification, the Right to be forgotten, the Right to restriction of processing, the Right to Data portability, and the Right to object.

We inform you that Open Fiber is committed to responding to your request no later than one month from date of its receipt. This deadline may be extended depending on the complexity or number of requests, and Open Fiber will inform you of the reason for any extension within one month of your request. The outcome of your request may be provided to you in writing, either in hard copy or in electronic form.

### **Methods of Exercising Rights**

The Data Subject may exercise the aforementioned rights at any time and request an updated list of Data Processors by sending a request to the following email addresses: [privacy@openfiber.it](mailto:privacy@openfiber.it) or [dpo.of@openfiber.it](mailto:dpo.of@openfiber.it).

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