

## Video surveillance Policy (Version 01, October 2018)

<b>Data Controller</b>	The Company processes the data subject's data, consisting of their images, under GDPR, National Laws on Data Protection, and the 8 April 2010 General Provision on Video Surveillance issued by the Guarantor Authority for the Protection of Personal Data ("Guarantor") and Article 4 of Law no. 300/1970
<b>Authorised internal processors</b> <b>Data subjects and personal data processed</b>	The use of the footage by personnel authorised by the Company is limited to unauthorised access cases and is aimed exclusively at communicating the recordings to the public authorities if requested. The Company uses the plant's perimeter video surveillance system, including the appurtenances and external accesses, to process and detect images of people passing in front of the cameras.
<b>Processing purposes and legal basis</b>	The processing is based on the Company's legitimate interest to protect its assets and safety in the workplace. The use of the video surveillance system is covered by a specific agreement signed by the Company with the Trade Union Representatives and is limited to the plant's external areas.
<b>Data Retention period</b>	The footage is kept for a maximum of seven days following recording. After that time it is self-deleted by overwriting, unless there is a specific requirement for longer storage (public holidays or closure of offices, evidence in the event of theft, or requests from the Judicial Authority, for less than seven days), and if it is necessary to comply with a request from the Judicial Authority or Police. This registration period was established to reconcile privacy protection purposes with those pursued by the video surveillance system (considering that small offences which could be a damage to company assets, may not be discovered within 24 hours from the event).
<b>Rights</b>	Data subjects may contact the Company or any external third-party processors for exercising their rights under the National Data Protection Laws and GDPR (Articles 15 et seq.) as they apply to that processing type.
<b>Right to oppose</b>	With the same methods as above, the data subject may partly or totally oppose, the processing of their data, if the legal basis is the legitimate interest of the Company, under GDPR Article 21.
<b>Complaint</b>	Any data subject who considers that the processing of their data violates GDPR Article 77, may complain to a supervisory authority where the data subject is resident or employed or with the supervisory authority where the alleged data breach has occurred.
<b>Updates and revisions</b>	The Company reserves the right to modify or update the Privacy Policy for any subsequent additions and amendments to the national and/or European Union regulations on the protection of personal data or for additional data processing purposes. The Policy is published with a progressive identification number and the month of publication, starting from the May 2018 version, which is identified with the number "00". The new versions of the Policy will replace the previous ones and will be valid, effective and applied from the date of publication on the company website or the disclosure date to data subjects.