



POLICY

Pursuant to and for the purposes of articles 13 and 14 of EU Regulation 27 April 2016 no. 679

General Data Protection Regulation

AFATAC Srl communicates that a series of obligations are foreseen for the Controller of the processing of your personal data, in particular, the methods of collection, recording, processing, storage, transfer to third parties, pursuant to EU Regulation 2016/679 on personal data protection.

Processing purposes and lawfulness

The collection and processing of personal data is carried out:

1. for the protection of the safety of people who access the production site of AFATAC Srl;
2. for the protection of company assets with respect to possible aggressions, thefts, robberies or acts of vandalism;

and will be subject to processing based on principles of correctness, lawfulness, transparency and protection of your privacy and rights.

The personal data that the Data Controller may collect is as follows:

- a) general data (surname, name, company of belonging);
- b) images detected by the video surveillance system.

The lawfulness of processing is based on:

- pursuit of the legitimate interest of the Data Controller (pursuant to article 6.1, letter f) of the GDPR).

The legitimate interest of the Data Controller is related to the protection of personnel and company assets.

Processing methods

The processing of data for the purposes set out is using either automated, on electronic or magnetic support, or non-automated, on paper, in compliance with the rules of confidentiality and security required by law, the resulting regulations and internal provisions.

Data is always processed in full compliance with the principle of proportionality of processing on the basis of which all personal data and the various processing methods must be relevant and not excessive in relation to the purposes pursued.

Stored data is protected by appropriate security measures, so as to reduce the risk of accidental loss or unauthorized access or processing that is not permitted or not in accordance with the purposes indicated. The images collected are recorded only outside working hours for a period of 48 hours and subsequently overwritten, except in case of requests by the judicial authority in case of criminal offenses.

To complete the information provided through the signs posted in the areas subject to video surveillance, it is hereby informed that the use of cameras is aimed at protecting the safety of customers, personnel and people who access the AFATAC Srl site, as well as the protection of company assets with respect to possible attacks, thefts, robberies or acts of vandalism. Images are detected and recorded only for the purposes



indicated above. Detection and recording is without any environmental interception of communications and conversations and without linking the images to further elements that make it possible to identify the parties concerned.

If the party concerned considers that the Data Controller does not process data in compliance with the appropriate security, a complaint may be filed with the Control Authority, in the manner envisaged.

Place of processing

Data is processed and stored at the headquarters in via Caluso 41 / A - 10035 MAZZE' (TO). Data can be transferred, in case of criminal offenses, to the Judicial Authority that requests it.

Obligatory nature of the conferment of data and consequences of eventual refusal to conferment

The conferment of data is obligatory and therefore any refusal to provide it in whole or in part may give rise to the impossibility for AFATAC Srl to allow access to the Company.

Rights of the party concerned

With regard to personal data, the party concerned may exercise the rights provided for in Chapter III of EU Regulation 2016/679 within the limits and under the conditions set out in articles 15 - 23 of the aforementioned Regulation. In particular, AFATAC Srl guarantees and recognizes the following rights to parties concerned:

- the right to access personal data in paper and/or electronic archives;
- the right to request correction, updating and cancellation, if incomplete or erroneous, and to oppose processing for legitimate and specific reasons;
- the right to obtain the correction of inaccurate personal data without unjustified delay. Taking into account the purposes of processing, the party concerned has the right to obtain the integration of incomplete personal data, also by providing an additional declaration;
- the right to obtain the cancellation of related personal data without unjustified delay for one of the reasons set out in article 17, paragraph 1 of the Regulation;
- the right to obtain the limitation of processing for one of the hypotheses referred to in article 18, paragraph 1 of the Regulation;
- the right to file a complaint with the Control Authorities, and to exercise the other rights recognized by the applicable regulations.

The party concerned may request the Data Controller to view any related images by submitting or annexing appropriate identification documents to the request. The reply to a request for access may not include any data related to third parties, unless the detail of the processed data or elimination of certain elements renders the personal data relating to the party concerned incomprehensible. Once the retention periods indicated above have elapsed, it will be impossible to satisfy the request for access.

Data Processing Controller

The rights in question may be exercised, also through an assignee, by sending a request to the Data Controller at the HQ of the Company in via Caluso 41/A – 10035 MAZZE' (TO) - Tel. 011 9830252 or the following e-mail: afatac@afatac.com.



The Data Controller is AFATAC Srl, via Caluso 41/A – 10035 MAZZE' (TO) - Tel. 011 9830252 represented by the legal representative. E-mail afatac@afatac.com

The complete text of EU Regulation 2016/679 (GDPR) is available on the website of the Control Authority www.garanteprivacy.it.

Mazzè, 25/05/2018

AFATAC Srl