



## PRIVACY NOTICE FOR VIDEO SURVEILLANCE

In accordance with Articles 13 and 15 of Regulation (EU) 2016/679 (hereinafter “GDPR”), we inform you that all the personal data collected by TARROS SpA (hereinafter the “Controller”) using a video-surveillance system shall be processed by our Company in compliance with the above mentioned regulation.

### Main definitions and legal references

#### Personal data

Any information relating to an identified or identifiable natural person («data subject»); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

#### Data subject

The natural person to whom personal data relate;

#### Processing

Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

#### Controller

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

#### Processor

A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

#### Data Protection Officer

A natural or legal person who informs and advises the controller, monitors compliance with the GDPR, provides advice as regards the data protection impact assessment (DPIA), cooperates with the supervisory authority and acts as the contact point for the supervisory authority;

#### Third Party

A natural person who is authorized to process personal data under the direct authority of the controller or processor

#### Recipient

A natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

#### Legal references

Legislative Decree 196/2003, and subsequent amendments, Regulation (EU) 2016/679 and video surveillance-decision by the supervisory authority dated 8<sup>th</sup> April 2010 (issued on the Gazzetta Ufficiale n. 99 on 29<sup>th</sup> April 2010)

### Controller

TARROS Spa, Via Privata Enel, 19126 La Spezia (SP) Italy  
+39 0187 5371 Certified email: tarros@pec.it.



### **Purposes, legal basis and data retention period**

The personal data disclosed to the controller are necessary for:

- 1) Protection of the company's assets
- 2) Safety at work;
- 3) Legal protection;
- 4) Legal obligations.

CCTV footage is processed for the time necessary to fulfil the aforementioned purposes and is retained for 48 hours.

The controller shall allow the access and copy of images and videos recorded by the video-surveillance system and/or retain records for a period beyond the usual retention period if ordered or requested by law enforcement and/or judicial authorities for investigative and/or procedural purposes.

The legal basis for processing, in compliance with Article 6 of the Regulation (EU) 2016/679, which authorizes the use of a video-surveillance system - as pacifically confirmed by the supervisory authority for the protection of personal data with decision of 22nd February 2018: preliminary guidelines for compliance with the articles of Regulation (EU) 2016/679, and the video-surveillance decision by the supervisory authority dated 8<sup>th</sup> April 2010 (issued on the Gazzetta Ufficiale n. 99 on 29<sup>th</sup> April 2010) - is the legitimate interest of the company.

In particular, as regards the video-surveillance system installed by TARROS S.p.A., the legal bases pursuant to Article 6 of GDPR, are:

- 1) the legitimate interest of the company to protect its tangible and intangible assets and the assets of third parties held in custody, and to ensure business continuity;
- 2) the legitimate interest of the company to guarantee, with suitable devices, the safety of its employees and third parties who, for different reasons, have access to outdoor spaces or any other place of within the company;
- 3) compliance with legal obligations and public safety.

### **Processing**

Processing is performed by automated means and/or manually, pursuant to Articles 29 and 32 of GDPR, and the video-surveillance decision by the supervisory authority dated 8<sup>th</sup> April 2010 (issued on the Gazzetta Ufficiale no. 99 on 29<sup>th</sup> April 2010), in compliance with the principles of lawfulness, proportionality, purpose limitation and personal data minimisation under Article 5 of GDPR. Data are processed at the registered office and any other place of business of the controller.

The features of the video-surveillance system, the operating procedures, the processing of the personal data obtained (images and videos) are in compliance with Law no. 300/1970 for employment protection (Workers Statute).

### **Recipients**

TARROS, in the performance of their tasks, employs its employees and third parties, such as collaborators or suppliers, who are authorised to process the personal data disclosed to the controller in compliance with the requirements of GDPR.

Any supplier who provides ancillary services linked to the above mentioned purposes is appointed as Processor under Article 28 of GDPR.

Grimaldi Srl 89, Via Alta Nuova, 19038 Sarzana (La Spezia) ph. no: +39 0187 670254 e-mail info@grimaldimpianti.com is the supplier of ordinary and extraordinary maintenance services for the video-surveillance system.

The data subject, submitting written request to the controller, can obtain access to the list of all the suppliers of TARROS as regards video-surveillance activities.

### **Special categories of personal data**

Pursuant to Articles 9 and 10 of GDPR the customer or the supplier may disclose personal data which can be defined as "special categories of personal data" revealing "*racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation*" and personal data relating to criminal convictions and offences.

#### **TARROS S.p.a.**

UFFICI: Via Privata Enel snc - 19126 La Spezia, Italy  
CENTRALINO: Tel. +39 0187 5371  
P.IVA 00910150119 - Iscr. Reg. La Spezia 000000

#### INDIRIZZI POSTA ELETTRONICA CERTIFICATA:

TARROS: tarros@pec.it  
UFFICIO CLAIMS: claim.tarros@pec.it  
UFFICIO TRASPORTI: trasporti.tarros@pec.it

www.tarros.it  
info@tarros.it

since  
**1828**  
www.tarros.it



#### **Transfer of personal data**

Personal data may be transferred to Member States or third countries not belonging to the Union.

#### **Rights of the data subject**

At any time the data subject, pursuant to Articles 15 to 22 of GDPR, shall exercise the following rights:

- a) right to obtain access to the personal data from the controller, right to obtain information about the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipients to whom the personal data have been or will be disclosed and, where possible, the period for which the personal data will be stored;
- b) right to request rectification or erasure of personal data and restriction of processing;
- c) right to data portability, right to object to processing of personal data, right to object to automated decision-making, including profiling;
- d) right to withdraw his or her consent at any time without affecting the lawfulness of processing based on consent before its withdrawal;
- e) right to lodge a complaint with a supervisory authority ([garante@gdpr.it](mailto:garante@gdpr.it) or [protocollo@pec.gdpr.it](mailto:protocollo@pec.gdpr.it)).

The data subject shall exercise his or her rights submitting written request to the controller.

Further information on personal data processing is available at the company's registered office.

Last updated July 2019

*TARROS SpA*

Signed original copy retained at the registered  
office address

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**www.tarros.it**  
[info@tarros.it](mailto:info@tarros.it)