INFORMATION NOTICE REGARDING VIDEO SURVEILLANCE IN ACCORDANCE WITH EU REGULATION 2016/679 ("GDPR")

	DATA CONTROLLER	S.A.C.B.O. S.p.A. Address: Via Orio al Serio 49/51, 24050 Grassobbio (BG) E-mail address <u>privacy@sacbo.it</u> ("Company").
İ	DATA PROTECTION OFFICER (DPO)	Partners4Innovation c/o S.A.C.B.O. S.p.A. Tel. no. 345 1682287, E-mail address <u>dpo@sacbo.it</u>

SIGNALS OF CCTV CAMERAS and PROCESSING OF PERSONAL DATA

For public order requirements, as well as for the protection of company assets, there are closed-circuit video surveillance cameras at the airport, the parking areas and some areas of the airport grounds. The CCTV cameras are conveniently signalled before the relevant range by means of appropriate signs, according to the Italian DPA's General Provision on Video Surveillance dated 8 April 2010. The Company will therefore process the images, displayed and / or recorded through the CCTV systems, of those people who will access the aforementioned premises.

DATA PURPOSES	PROCESSING	— × –	LEGAL BASIS FOR PROCESSING DATA	Ō	DATA RETENTION PERIOD
 Video surveillance activities aim to: Protect public security, prevent and detect offences; Monitor the vehicles and aircrafts movement area; Vet the security of operational areas and plants. 		Legitimate I	nterest		er the images are recorded

Once the above retention periods have expired, the Data will be destroyed, erased or made anonymous, compatibly with the technical erasure and backup procedures.



DATA PROVISION COMPULSORINESS

The refusal to provide data means that the data subject cannot access the Controller's premises. Entering video surveillance areas involves gathering, recording, retaining and generally using the images of data subjects.



DATA RECIPIENTS

Data may be communicated to parties operating as **data controllers**, such as supervisory bodies and authorities, and private or public organisations in general authorised to request data.

Data may be processed on behalf of the **data controller** by external parties appointed as data processors carrying out specific activities for the controller, such as dealing with accounting, tax and insurance requirements, sending correspondence, managing takings and payments etc.



PARTIES AUTHORISED TO PROCESS DATA

Data may be processed by employees in company departments who are responsible for carrying out the activities outlined above and have been authorised to process the data and have received suitable operating instructions.

DATA SUBJECTS' RIGHTS - COMPLAINT TO THE SUPERVISORY BODY

By contacting the Company via e-mail sent to privacy@sacbo.it data subjects can:

- Ask the controller for access to personal data;
- Object to processing;
- Ask the restriction of the data processing in the cases set out in article 18 GDPR, where applicable

Data subjects have the right to lodge a complaint to the competent Supervisory Authority in the member state where they are resident or where they work, or the member state where the alleged breach took place.

With regard to the images recorded, the right to correct or amend data as outlined in article 16 GDPR does not apply due to the intrinsic nature of the data (images captured in real time regarding an objective fact). The right to data portability as outlined in article 20 of the GDPR does not apply as the processing is carried out to implement a legitimate interest of the controller.

Data subjects can request to view the images where they have been captured by including a suitable ID document with the request. Responses to access requests cannot include third-party data unless the data can be broken down or have elements removed to render the personal data in question unrecognisable. Such access requests cannot be fulfilled once the aforementioned retention time has elapsed.