

INFORMATION ON THE USE OF PERSONAL DATA IN RELATION TO THE USE OF VIDEO SURVEILLANCE SYSTEMS

Pursuant to art. 13 GDPR EU 2016/679

B.B.M. SERVICE S.R.L. provides this information pursuant to Article 13 of GDPR 16/679 to inform you that a video surveillance system is active at the registered office in San Pellegrino Terme (BG), at Via Pregalleno no. 24 - 24016 and at the Lenna (BG) plant, at Via Dell'Industria, no. 11 - 24010, appropriately indicated before the relevant range of action by means of special signs in accordance with the provisions of the General Provision on Video Surveillance of the Privacy Guarantor of 8 April 2010 and the Guidelines 3/2019 on the processing of personal data through video devices adopted on 29 January 2020 by the European Data Protection Board ("EDPB"). According to the regulations of the Regulation, this processing will be based on the principles of correctness, lawfulness and transparency and the protection of your privacy and your rights.

This information supplements the simplified information provided to data subjects through the signs placed before the range of action of the video surveillance cameras installed by the Data Controller.

1. WHO IS THE DATA CONTROLLER - CONTACT DETAILS

The Data Controller is B.B.M. SERVICE S.R.L. (hereinafter also the "**Data Controller**" or "**Company**"), with registered office in San Pellegrino Terme (BG), Via Pregalleno n. 24 - CAP 24016. The Data Controller can be contacted at the following addresses: e-mail privacy@bbmpackaging.com; PEC: bbmservice@legalmail.it; telephone +39 0345 23642.

Pursuant to and for the purposes of art. 37-39 of the European Regulation GDPR 16/679, B.B.M. SERVICE S.R.L. has not designated a Personal Data Protection Officer (DPO).

The updated list of Data Processors, appointed by the Data Controller pursuant to art. 28 of the aforementioned EU Regulation, and of the Persons Authorised to Process, can be consulted at the registered office of B.B.M. SERVICE S.R.L.

2. CATEGORIES OF DATA PROCESSED

The Data Controller will process the images taken by the video surveillance system's video cameras, equipped with a "24h 7gg" motion shooting technology that does not provide for the continuous recording of images, but the recording is activated through special motion detection sensors, even on closing days, for the purposes referred to in point 3 of the following information. The presence of the cameras is indicated by signs posted in the access areas to the areas subject to control and near the shooting areas.

3. LEGAL BASIS - PURPOSE OF THE PROCESSING

The recorded images will be used exclusively for the purposes of security and protection of company assets as well as to ensure the safety and security of people who carry out their work activities at the Data Controller's workplaces.

The legitimate interest of the Data Controller to protect its assets and prevent unlawful acts as well as to guarantee the safety of its working personnel [pursuant to Article 6 paragraph 1 letter f) GDPR] constitutes the legal basis of the processing. The recorded

images are also used to comply with specific requests from the Judiciary or law enforcement agencies and law enforcement authorities and in this case the legal basis of the processing is the legal obligation [art. 6 para. 1 lett. c) GDPR].

4. METHODS OF PROCESSING

The processing is carried out through the use of opto-electronic tools (a system for the offices of the registered office in San Pellegrino Terme (BG), at Via Pregalleno n. 24 - 24016 consisting of 8 HIKVISION mod. DS-2CE56D7T-ITM 2.8 mm 1080p and HIKVISION mod. DS-2CE16D7T-IT 3.6mm 1080p and No. 1 HIKVISION 7216HQHI-F2/N/A recording equipment. The system relating to the shed in San Pellegrino Terme (BG), at Via Pregalleno n. 24 - 24016 consists of n. 11 HIKVISION cameras mod. DS-2CE56D7T-ITM 2.8 mm 1080p and HIKVISION mod. DS-2CE16D7T-IT 3.6mm 1080p and No. 1 HIKVISION 7216HQHI-F2/N Recording Equipment |A and a system for the offices of the Lenna (BG) headquarters, at Via Dell'Industria, n. 11 - 24010, consisting of n. 12 COMELIT MCAM671B ELVOX5AL7/S and COMELIT 40671 COMELIT 40676 cameras, n. 1 SPEED DOME COMELIT 40801 camera to monitor the square in front of the warehouse, all with 540TVL resolution, n. 1 ELVOX 46540.h16 recording equipment). The processing is managed only by specifically appointed, authorized and/or designated personnel and the data is stored by computer. The data are processed in compliance with the technical and organisational security measures provided for by the EU Regulation through appropriate procedures to guarantee their confidentiality. All data provided are processed according to the principles of correctness, lawfulness and transparency both in paper and electronic form and protected by technical and organizational measures to ensure adequate levels of security pursuant to art. 25 and 32 of the GDPR. Personal data will not be disseminated or communicated to third parties, except for the needs mentioned above.

None of the cameras associates other personal data (p.es. biometric data) with the images collected and no so-called intelligent software is used that allows the recognition of the person by linking the images detected (e.g. facial morphology) with other specific personal data or with a pre-established sampling at the detection itself.

5. DURATION OF PROCESSING AND STORAGE PERIOD OF IMAGES

The storage of the recording is limited to a maximum of 72 (seventy-two) hours following the detection, after which the images will be removed from any fixed or mobile support - the video recording system automatically deletes them by over-recording, in such a way as to make the deleted data unusable - except for special needs for further storage in relation to the weekend, holidays or company closures that make it necessary to extend the retention period, in the event that a specific investigative request by the judicial authority or the judicial police must be adhered to.

6. CATEGORIES OF RECIPIENTS

The data may be communicated to subjects operating as Data Controllers, such as supervisory and control authorities and any public entity entitled to request the data, such as the judicial and/or public security authorities. The Data may be processed, on behalf of the Data Controller, by subjects designated as persons in charge of the processing, such as employees and personnel of the Safety and Environment Office of the Data Controller, and as data processors, such as companies that deal with control and surveillance services and companies that deal with maintenance services of the video surveillance system.

7. LOCALIZATION OF DATA PROCESSING AND TRANSFER ABROAD

The Company guarantees that no data covered by this document will be communicated or transferred to natural and/or legal persons with non-EU headquarters.

The cameras are indicated by signs posted in the access areas to the areas subject to control and near their installation and are positioned in areas that it has been deemed necessary to monitor for specific protection purposes. The plan is on file.

8. AUTHORIZATION FOR PROCESSING

In order to ensure maximum transparency in the processing of the data collected by the video surveillance system and in compliance with the principles of correctness and lawfulness, the same system has been authorized by the competent Territorial Labor Inspectorate.

9. RIGHTS REFERRED TO IN CHAPTER III OF EU REGULATION 2016/679

With regard to the data provided, the interested party may exercise, without particular formalities, the rights provided for by art. 15 et seq. of EU Regulation 16/679 by contacting the Data Controller. In particular, you may obtain from the Data Controller, by contacting him at the contact details provided above:

- confirmation as to whether or not personal data concerning him or her is being processed and, if so, to obtain access to the personal data and information concerning the processing and to obtain rectification thereof;
- the deletion of your data without undue delay, if one of the reasons provided for by art. 17 of the GDPR;
- the limitation of the processing of your data when one of the hypotheses provided for by art. 18 of the GDPR;
- the right to receive the personal data concerning you that you have provided to a controller in a structured, commonly used and machine-readable format and you have the right to transmit those data to another controller without hindrance from the controller to whom you have provided them;
- In addition, you have the right to obtain the direct transmission of personal data from one controller to another, if technically feasible;
- the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you (right to object, pursuant to Article 21 GDPR);
- the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you;
- the right to request a complete and updated list of all the Data Processors and authorised to process your personal data;
- right to lodge a complaint with the competent Supervisory Authority pursuant to Article 77 of the GDPR (Italian Data Protection Authority).