

# Privacy Policy Video Surveillance ADR Ingegneria

Pursuant to current privacy regulations (European Regulation 2016/679 "GDPR" and Legislative Decree No. 196/03 and subsequent amendments and additions) the following notice is provided regarding the company headquarters of ADR Ingegneria, located on the second floor of the Bravo building in Piazza Almerico da Schio 1 - 00054 Fiumicino (Rome) - Leonardo da Vinci Airport.

With reference to the employees of the Companies of ADR Ingegneria this policy integrates and does not replaces the policy provided pursuant to art. 13, GDPR in relation to the existing employment relationship.

It should also be noted that in relation to the Video surveillance system in question, the minute of trade union agreement was signed on 08/08/2023 between ADR Ingegneria S.p.A. and the trade union representatives.

## 1. DATA CONTROLLER

ADR Ingegneria S.p.A. (hereinafter also "ADR Ingegneria" or "the Controller") with registered office in Piazza Almerico da Schio 1- 00054 Fiumicino (Rome).

Given that the headquarter of the company in question is located within the airport perimeter and the camera system used is managed by the airport operator, the images are connected to the Police Forces in their quality of autonomous controller.

## 2. DATA PROTECTION OFFICER

ADR Ingegneria has appointed a Data Protection Officer. Contact information of the Data Protection Officer can be found at <https://www.adr.it/web/aeroporti-di-roma-en/>

## 3. PURPOSE AND LEGAL BASIS OF THE PROCESSING

Processing is carried out for purposes of security and protection of company assets based on the pursuit of a legitimate interest of the Data Controller (Article 6.1 letter f), GDPR).

For this purpose, some internal areas of the Bravo building of ADR Ingegneria considered areas at risk of intrusion (lifts, access door and emergency exits) are subject to video surveillance.

## 4. TYPES OF DATA PROCESSED

The personal data processed consists of images captured through video surveillance systems.

The images may also refer to special categories of data under Article 9 GDPR.

## 5. PROCESSING METHODS

The devices are installed in such a way as to exclude any form of control over workers.

The data are processed in compliance with the regulations in force by means of IT, telematic and manual tools with logics strictly related to the indicated purposes, so as to guarantee the security and confidentiality of the data themselves, in compliance with the provisions of current privacy legislation.

The data are collected by cameras located near the areas concerned and processed on the IT system of the airport operator.

## **6. DATA RETENTION PERIODS**

Authorised operators may view the camera images referred to in this policy in live mode only, with the possibility of access by authorised Security personnel limited to the previous 24 hours.

The video surveillance systems referred to in this policy shall retain the images for a maximum of 7 days. Therefore, during this retention period of 7 days following the filming, the images remain in the exclusive availability of State Bodies/Police Forces. This is without prejudice to the possibility for the State Bodies/Police Forces to autonomously follow up, in their capacity as data controllers, on necessities of further storage also for specific investigative requests or by order of the judicial authority.

## **7. DATA RECIPIENTS**

The data collected through the video-surveillance systems referred to in this policy can be accessed - as described above - by State Bodies/Police Forces and processed only by authorized operators of ADR Ingegneria and ADR S.p.A.

In addition, access to the live viewing of the images is granted to authorised operators of ADR Security S.r.l., an ADR Group company that provides airport security control services for ADR at Fiumicino and Ciampino airports, specifically appointed as external Data Processor pursuant to article 28, GDPR by ADR S.p.A.

Finally, specialised suppliers of technical, IT and maintenance services appointed as Data Processors pursuant to Article 28 GDPR may have access to the data.

Monitors and recording devices are located in the "control room" protected by an access system registered and controlled by means of a badge, which allows access only to specially appointed personnel.

Under no circumstances will the data be disseminated.

## **8. DATA TRANSFER OUTSIDE THE EU**

Personal data are not subject to dissemination and/or communication to third parties located outside the European Economic Area.

## **9. RIGHTS OF THE DATA SUBJECTS**

Finally, we would like to inform you that the data subjects affected by the personal data processing activities referred to in this policy may exercise in accordance with EU Reg. 2016/679 (GDPR):

The right of access under Article 15 exclusively where the conditions are met and in so far as the exercise of this right does not violate the rights and freedoms of other subjects (as set out in the European Data Protection Board's Guidelines of 29 January 2020 on the processing of personal data by video devices). It is understood that in cases where the images are subject to exclusive availability by the State Bodies/Police Forces, ADR, as it is not legitimated to access the images, is not in a position to comply with any requests of the data subject.

The right to object under Art. 21. If the right to object is exercised, the Controller reserves the right not to comply with the request, and thus to continue processing, if there are compelling legitimate reasons to proceed with the processing that prevail over the interests, rights and freedoms of the data subject.

These rights may be exercised by making a request addressed without formalities to the Data Protection Officer of the Data Controller by writing to the e-mail address *dpo@adr.it* or by post to the Data Protection Officer (DPO) Via Pier Paolo Racchetti, 1 00054 - Fiumicino (Rome).

The right to lodge a complaint directly with the Data Protection Authority pursuant to Article 77, GDPR remains unaffected.

The Data Controller reserves the right to amend and update this policy over time.

Last updated, April 2024