

Green Oleo s.p.a. – PRIVACY POLICY RELATING TO VIDEO SURVEILLANCE

Data Controller	Green Oleo s.p.a., with registered office at via Bergamo no. 66, Cremona (" Controller "), in its capacity as data controller pursuant to Art. 4(1) no. 7 of Regulation (EU) 2016/679 (" GDPR "), provides the following information on the processing of your personal data (" Data Subject "). This policy applies to the processing of the personal data of the Data Subjects, carried out by the Controller through the video surveillance system at its premises and facilities. For any information and/or query related to this policy and/or the processing indicated herein, the Data Subject may contact the Controller at any time, by sending a registered letter with return receipt to the Controller's registered office or an e-mail to privacy@greenoleo.com.
Categories of personal data processed	The Controller processes the image of the Data Subjects, as captured by the video surveillance system at the Controller's premises and facilities. Where such processing may result in the remote monitoring of Data Subjects who are also the Controller's employees, the Controller has entered into agreements with the relevant trade unions, which it undertakes to comply with and keep up to date at all times.
Purpose of processing and legal basis – <i>legitimate</i> <i>interest</i>	The Controller processes the personal data of the Data Subjects to ensure the safety of all those who, for various reasons, access the Company's premises and facilities, as well as to protect the Company's assets. The legal basis for the processing is the legitimate interest of the Controller. The provision of data is necessary to allow the Data Subject to access the premises and facilities of the Controller; therefore, if such data are not provided, the Controller will be prevented from allowing such access.
Purpose of processing and legal basis – <i>legal obligation</i>	The Controller may process the personal data provided by the Data Subject to fulfil obligations arising from provisions of law, including Community law, as well as from rules, codes or procedures approved by public authorities, as well as following requests by public bodies. The legal basis for the processing is the fulfilment of a legal obligation to which the Controller is subject. The provision of data is necessary to enable the Controller to comply with these legal obligations and, therefore, if such data are not provided, the Controller will be prevented from allowing the Data Subject's access.
Purpose of processing and legal basis – <i>legitimate</i> <i>interest</i>	The Controller may process the personal data provided by the Data Subject for the establishment, exercise or defence of legal claims. The legal basis for the processing is the legitimate interest of the Controller. The provision of data is necessary to allow the Data Subject to access the premises and facilities of the Controller; therefore, if such data are not provided, the Controller will be prevented from allowing such access.
Processing methods	The personal data provided by the Data Subject are processed, within the limits of the achievement of the purposes set out above and for the storage periods indicated herein, by automated and manual means, on electronic and/or paper media owned by the Controller or by third parties, in compliance with the principles of lawfulness, fairness and transparency, data minimisation and the rules of confidentiality, integrity and security provided for by law, by the consequent regulations and by



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	specific internal provisions. In addition, the Controller has implemented appropriate technical, physical and organisational measures to protect personal data and to avoid and/or mitigate the consequences of any breaches.
Data disclosure	The Data Subject's personal data will not be disseminated. The personal data provided by the Data Subject may be disclosed to third parties - though only for the aforementioned purposes and for the storage periods indicated herein - such as: public administrations (e.g., public bodies, police forces); service providers and consultants (e.g., IT service providers, security service providers). Such third parties will act either as independent data controllers or as data processors (in which case, the Controller will appoint them in writing and give them instructions on personal data processing). A complete list of the data processors appointed by the Controller can be easily and freely obtained by sending a request to the Controller. In addition, the personal data of the Data Subject will be processed by certain employees of the Controller, who have been formally appointed as data processors and adequately instructed to process personal data exclusively for the purposes set out herein
Transfer of data	The Data Subject's personal data will not be transferred to countries outside the EEA. In any event, should such a transfer be necessary, in the absence of an adequacy decision, the Controller will adopt appropriate safeguards under the GDPR to ensure an adequate level of protection for the personal data transferred. The Data Subject may obtain a copy of such safeguards.
Data storage	Personal data are stored and processed on computer and/or paper media owned by the Controller or third-party service providers. Personal data will only be kept for as long as necessary for the purposes for which they were collected and, in any case, will be deleted within a maximum period of 48 hours from their collection, without prejudice to further storage requirements in relation to holidays or office closures.
Rights of the Data Subject	By contacting the Controller as indicated in this policy, the data subject may: obtain confirmation as to whether or not personal data concerning him or her are being processed and, where that is the case, obtain information as to the purposes of the processing, the storage period and the persons to whom the data are disclosed (so-called right of access – Art. 15 GDPR); obtain the rectification, updating or integration of personal data concerning the Data Subject (so-called right to rectification – Art. 16 GDPR); obtain the erasure of personal data concerning him/her (so-called right to erasure – Art. 17 GDPR) or restriction of processing (so-called right to restriction – Art. 18 GDPR), if the conditions are met; receive in a commonly used, machine-readable and interoperable format the personal data concerning the Data Subject (so-called right to data portability – Art. 20 GDPR); object to processing by the Controller, where the legal conditions are met (so-called right to object – Art. 21 GDPR).
	The data subject may also apply to the Data Protection Authority (www.garanteprivacy.it) with headquarters at Piazza Venezia no. 11, 00187 - Rome, in order to enforce his or her rights in relation to personal data processing.

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