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The purpose of this document (hereinafter referred to as the “**Policy**”) is to provide information regarding the processing of personal data as part of video surveillance activities at the premises of Tamini Trasformatori S.r.l. (“**Personal Data**”), which will be acquired and processed by Tamini Trasformatori S.r.l. as data controller (“**Tamini**”) in accordance with art. 4, par. 1, no. 7) of Regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016 (“**GDPR**”) in the manner and for the purposes set out below.

The Policy is set forth in accordance with article 13 of the GDPR, as well as in compliance with the “Provision on video surveillance - 8 April 2010” undertaken by the Italian Data Protection Authority (the “**Authority**”) and the “Guidelines 3/2019 on processing of personal data through video devices” issued by the European Data Protection Board on 10 July 2019 (collectively, the “**Privacy Regulation**”).

 PERSONAL DATA	<p>The following Personal Data will be processed:</p> <ul style="list-style-type: none"> ➤ image of subject being filmed ➤ other information from the video footage and related static images (e.g. location, date and time, movement, direction, vehicle number plate etc.) ➤ identifying information (e.g. identity document, visitor identification codes) ➤ contact information (e.g. telephone number, e-mail address, postal address) ➤ date and time of entry, exit and discharge from company premises, detailed within the registration forms. 				
 PURPOSE	 Protection of Tamini's corporate assets	 Safety and protection of natural persons	Management of access to company premises	Defensive requirements	 Fulfillment of regulatory obligations to which the Controller is subject
 LEGAL BASIS	<p>The legitimate interests of Tamini (article 6, par. 1 (f) of the GDPR), due to the need to protect its own physical and information assets.</p>	<p>The legitimate interests of Tamini (article 6, par. 1 (f) of the GDPR), due to the need to ensure the safety and security of natural persons, whether these be Terna Group employees or third parties, also within the scope of the observations made herein with respect to the purpose of protecting Tamini's corporate assets.</p>	<p>The legitimate interests of Tamini (article 6, par. 1 (f) of the GDPR), consisting of the need to regulate entrances and exits from company premises and thus ensure the security of the premises.</p>	<p>The legitimate interests of Tamini (article 6, par. 1(f) of the GDPR, due to the need to meet legal defence requirements, out of court and in the stages preceding the litigation.</p>	<p>Requirement to fulfil a legal obligation to which Tamini is subject (article 6, par. 1 (c) of the GDPR), including compliance with requests from the Police or Judicial Authorities</p>
 Locations and areas under video surveillance	 Operating modes	 Recipients of Personal Data		 Storage	
<ul style="list-style-type: none"> ➤ Tamini's buildings and associated facilities 	<ul style="list-style-type: none"> ➤ The devices are designed to record images such that the viewing angle is limited to the area to be protected. 	<ul style="list-style-type: none"> ➤ Tamini personnel duly instructed, previously and formally authorised to process Personal Data in accordance with articles 29 and 32, par. 4 of the GDPR and <i>2-quaterdecies</i> of Italian Legislative Decree no. 196/2003 (“Privacy Code”) and certified ➤ third-party companies appointed as data processors in accordance with article 28 of the GDPR and tasked with services such as the maintenance of the video surveillance system and the performance of private security activities. <p>  Other than for cases related to the fulfilment of regulatory obligations (in particular, except in cases of request by the Police and/or Judicial Authorities), Terna will not transmit, disclose or communicate images and Personal Data to third parties - nor will it transfer such outside the European Economic Area. </p>		<ul style="list-style-type: none"> ➤ The data is stored in accordance with the principles of minimisation and limitation of storage in accordance with article 5, par. 1, letter c) and e) of the GDPR. ➤ Specifically, visitor registration data will be stored for 12 months from the date of registration. ➤ Specifically, the retention period for video surveillance images is a maximum of 48 hours from recording. <p>  At the end of this period, the images and Personal Data will be permanently deleted by automatic override. In any case, the Data Controller reserves the right to retain Personal Data for as long as is necessary to fulfil the legal obligations to which it is subject and to meet legal defence requirements in court, out of court and in the phases preceding litigation. </p>	

	
 DATA SUBJECTS' RIGHTS	<p>Access – confirmation as to whether or not Personal Data is being processed and further information on the processing (art. 15 GDPR).</p> <p>Rectification – rectification and integration of inaccurate Personal Data without undue delay (art. 16 GDPR).</p> <p>Opposition - opposition to processing at any time, for reasons related to the particular situation of the data subject: Terna will refrain from processing the Personal Data further (except for the cases stipulated in art. 21 GDPR - e.g. compelling legitimate reasons).</p> <p>Deletion - deletion of Personal Data without undue delay for any of the reasons listed in art. 17 GDPR (e.g. Personal Data no longer required for the purpose of collection) outside of the cases provided for therein (e.g. fulfilment of a legal obligation).</p> <p>Limitation - restriction of processing where one of the conditions of art. 18 GDPR occurs.</p> <p>Portability - in the case of automated processing, receipt of Personal Data in a structured, commonly used and readable by an automatic device, and transmission to another data controller without hindrance by Terna (art. 20 GDPR).</p> <p>The data subject may lodge a complaint with the supervisory authority of the Member State in which he/she normally resides, works or where the alleged breach occurred (e.g. the Italian Data Protection Authority - www.garanteprivacy.it).</p>
 CONTACT DETAILS OF THE CONTROLLER AND DPO	<p>Registered office – Viale L. Cadorna, 56/A (20025) Legnano (MI), Italy</p> <p>Rights and requests of Data Subjects – the Data Subject may contact Tamini via the e-mail address privacy@tamini.it and the DPO (Data Protection Officer) at dpo@tamini.it to exercise the above rights or for other requests regarding processing activities.</p>
 SECURITY AND COMPLIANCE	<p>Terna will undertake processing:</p> <ul style="list-style-type: none"> ➤ in accordance with the principles set out in article 5 of the GDPR, respecting the essence of the right to the protection of Personal Data and upholding Terna's legitimate interests on the basis of a considered balance with the interests, rights and freedoms of the individuals concerned ➤ through appropriate and specific security measures ➤ in accordance with the limits established by the Privacy Regulation and the collective agreement signed with the Company Trade Union Representatives in accordance with article 4 of Italian Law no. 300 of 20 May 1970 (Statute of Workers).

Kind regards,
Tamini Trasformatori S.r.l.