

COMMUNICATION ON VIDEO SURVEILLANCE

SUBJECT: Information Pursuant to Art. 13 – EU Regulation 2016/679

In accordance with Article 13 of the EU General Data Protection Regulation (GDPR): Regulation (EU) 2016/679 “Information to be provided where personal data are collected from the data subject”, we are responsible for providing you with the following information relative to the processing of your personal data in the context of your business relationship with De Wave srl.

The Data Controller is **De Wave srl** (herein after named “Data Controller”) with legal registered office in Via Manzoni, 38 20121 – Milan (MI) and operational headquarters in Via de Marini, 60, 16149 - Genova (GE), C.F. /P. IVA 02206870996. The Data Controller can be contacted at: privacy@dewavegroup.com. The Data Controller has not currently designated a Data Protection Officer.

PURPOSE OF AND LEGAL BASIS FOR PROCESSING DATA

Personal data, collected both during initial negotiations and through the ongoing working relationship, are processed by the Data Controller for the following purposes:

- Protection of offices and operational headquarters

The legal basis for processing of personal data is identified in Art. 6(1)(f); legitimate interests of the Data Controller to protect the company’s assets and to ensure the safety of those who access its properties.

PROVISION OF DATA

Given the purpose for which personal data is collected, no provision from the data subject is required as he/she necessarily enters into areas where video cameras are installed to access the Data Controller’s premises. Additional video cameras are present in common external areas (terraces and courtyards), and in the data processing center. If a data subject does not wish to be filmed, he or she will necessarily have to stop at the signposts indicating the presence of a video camera which are placed right before entering the camera’s field of vision.

RECIPIENTS OF PERSONAL DATA

All of your collected data may be shared, exclusively for the purposes specified above, with the following categories of recipients:

- employees and associates of the Data Controller, in their capacity as persons authorized to process personal data, who have expressly agreed to a commitment of confidentiality or have an appropriate legal duty of confidentiality.



- Persons or companies, with whom the Controller has relationships in order to conduct day-to-day activities, or who have been specifically mandated (as required by law) to achieve the purposes for which the data were collected. Such recipients will act as data processors on behalf of De Wave srl and will keep the data only for as long as is necessary to achieve the purposes for which the data were collected.
- Judicial or supervisory authorities, administrators, public bodies and agencies, in performance of their duties.

The Data Controller ensures that the processing of your personal data by the above-mentioned recipients is carried out in compliance with current legislation.

METHODS OF TREATMENT

Personal data collection and processing shall be conducted lawfully, fairly, in a transparent manner, and in a way that ensures its adequate protection. The Data Controller takes appropriate technical and organizational measures to protect personal data from accidental or unlawful processing, loss, destruction, and/or damage.

The data collected will be processed using electronic or automated IT and telematic tools, or in paper form, in a manner strictly limited to the purposes for which it was collected and in a way to guarantee its security. Further, the data will be kept for a period of time strictly necessary to achieve the purposes for which it was collected, subject to legal requirements or obligations established by current legislation even after the termination of the processing period, or until such time permitted by Italian law to protect the interests of the Data Controller

Further information regarding the retention period of personal data and the criteria used to determine this period can be requested in writing from the Data Controller.

TRANSFER OF DATA OUTSIDE OF THE EUROPEAN UNION

Your personal data are stored on servers located at the Data Controller's premises within the European Union.

DATA RETENTION PERIOD

Your personal data will be stored for 24 hours.

RIGHTS OF THE DATA SUBJECT

In accordance with the provisions of the GDPR, you have the right to exercise the following rights:

- a. right of access – the right to obtain confirmation from the Data Controller as to whether or not your personal data is being processed. In instances where your personal data is being processed, you may request information related to the purpose of the processing, categories of personal data processed, and the relative retention period (article 15, GDPR);
- b. right to rectification – the right to obtain from the Data Controller, without undue delay, the rectification of inaccurate personal data and the integration of incomplete personal data (article 16, GDPR);
- c. right to deletion – the right to obtain, without unjustified delay, the deletion of personal data concerning you in the cases indicated in the GDPR (article 17, GDPR);
- d. right to restriction of processing – the right to obtain the restriction of data processing from the Data Controller in the cases indicated in the GDPR (article 18, GDPR);
- e. right to data portability – the right to receive your personal data in a structured, commonly used and machine readable format from the Data Controller, and the right to transmit those data to another controller without hindrance from the Controller to which the data have been provided (article 20, GDPR)
- f. right to object – the right to object to the processing of your personal data, unless there are legitimate reasons for the Data Controller to continue the processing (article 21, GDPR);
- g. the right to revoke consent at any time without affecting the lawfulness of the processing based on the consent given before revocation.
- h. the right to register a complaint with the supervisory authority – register a complaint with the Data Protection Authority, located at Piazza di Montecitorio n. 121, 00186 Roma (RM)

HOW TO EXERCISE RIGHTS

Data subjects may at any time exercise their rights by sending:

- a registered letter to: De Wave srl, Via De Marini 60, 16149 Genova (GE)
- an e-mail to: privacy@dewavegroup.com

