

INFORMATION ON THE PROCESSING OF PERSONAL DATA COLLECTED THROUGH A VIDEO SURVEILLANCE SYSTEM INSTALLED AT THE STATION BUILDINGS

Pursuant to Article 13 of European Regulation 2016/679 (GDPR) Autostrade per l'Italia S.p.A, in its capacity as Data Controller, informs its staff and the staff employed by third parties who provide ASPI with money withdrawal/collection activities (Interested Parties) that at the automatic cash machines and safes located inside the buildings at the stations on the sections of motorway under its jurisdiction, a video surveillance system is in operation, whose systems (video cameras), duly indicated by means of special signs, are set up to operate in compliance with the provisions of the privacy regulations in force (GDPR and Legislative Decree 196/2003 et seq.m.i.), the provision of the Guarantor for the protection of personal data (General video-surveillance provision of 8 April 2010), and Law no. 300/1970 (Workers' Statute) .

In particular, the cameras are installed in such a way as to capture images only of the withdrawal and deposit of money from/into the cash machines and the safes accessed, for the former, inside the toll booths and, for the latter, inside the station building.

This Information Notice supplements the 'simplified' Information Notice provided through the signs placed at the cameras.

1. DATA CONTROLLER

The data controller is Autostrade per l'Italia S.p.A. ("ASPI") with registered office in Via A. Bergamini, 50 - 00159, Rome - Italy.

The Data Protection Officer (DPO) for Autostrade per l'Italia S.p.A. is domiciled for the purpose at the Company's registered office and can be contacted at the PEC address: dpo@pec.autostrade.it.

2. TYPE OF DATA PROCESSED

The personal data ('data') processed by ASPI includes video surveillance data (images taken by video cameras).

3. PURPOSE AND LEGAL BASIS OF PROCESSING

Personal data are processed for the sole purpose of safeguarding the company's property and assets as well as to increase the safety and protection of personnel and further protection of personnel, including with regard to the withdrawal of money and the payment of takings.

Specifically, the purposes pursued by the Controller are to:

1. prevent acts of damage to company assets in order to limit the risk of theft of money inside the above-mentioned equipment, robberies and/or possible vandalism;
2. ensure safety in the workplace, to protect workers, including with respect to the collection and payment of takings by ASPI employees and employees of third parties who frequent the company premises concerned.

This data is processed on the basis of the assumption of the Controller's legitimate interest in the safety of the working environment and the protection of its own staff as well as that of third party companies providing

ASPI with money withdrawal/collection activities, as well as the integrity of the company's assets, pursuant to Article 6(1)(f) of the GDPR.

On the subject of remote control of employees, ASPI operates in compliance with the provisions contained in the Agreement signed with the trade union representatives pursuant to Article 4 of Law no. 300/70 on 18 July 2013 and the privacy regulations in force.

4. METHODS OF TREATMENT

The processing of the images is carried out with logic strictly related to the above-mentioned purposes, in electronic mode by means of a system of fixed network cameras that cannot be panned, installed in this way:

- 1) a video camera inside each collection booth, positioned on the wall opposite the positioning of the cash desk so as to film only 'the area in front of the counters and the area where the cash is opened (as well as) the area where the money is handled' in order to document only the deposit and withdrawal operations. The video surveillance system is always active, except in cases where special management requirements require the manual intervention of a designated employee to collect the money: in the latter case, the video surveillance system is only automatically reactivated when an alarm is triggered in the booth or when the safe is opened for the time limited to the operations requiring the handling of cash.
- 2) a camera inside each building, where the safes are housed, to film only the deposit and withdrawal of money.

In compliance with the principles of relevance and non-excessiveness (proportionality) and of necessity in relation to the purposes pursued, pursuant to the GDPR and current legislation, the cameras are set up in such a way that they can only capture images that are indispensable, avoiding the collection of detailed, enlarged images or irrelevant details. In particular, the camera angle is limited to what is strictly necessary for documenting deposit and withdrawal operations, and the camera is set up to automatically deactivate in the event of the presence of toll service personnel inside the booths, without prejudice to reactivation in the event of an alarm or if it is necessary to open the safe.

The media are stored in protected premises and are not accessible except by personnel appointed in writing and exclusively for the above-mentioned purposes, who have received adequate training in their use

5. STORAGE TIMES

The personal data (images) collected by means of the video cameras shall be retained - with respect to the ordinary terms deemed appropriate by the Garante - for the time necessary for the purposes indicated in consideration of the logical time scheduling of withdrawals from motorway stations and of the related counting and reporting requirements of the flow of money and, in any event, up to a maximum term of twenty (20) days, in accordance with the provisions of the Trade Union Agreement referred to in point 3 above and indicated by the Garante itself in its order of 8 July 2015.

In particular, these data are retained for the above-mentioned period depending on the 'time frame' necessary (i) for the completion of the deposit and withdrawal operations (including the transport of the withdrawn money, the counting thereof and the final accounting), (ii) for the viewing of images relating to any events that occurred during the period of reference to the collection (thefts, robberies, discrepancies between the sums declared at the time of withdrawal and those counted).

Without prejudice to the need for further preservation of the images for possible requests by the competent authorities and/or for the protection of any rights in court, the images are automatically deleted after the aforementioned period.

6. RECIPIENTS OF DATA

Within ASPI, only those persons entrusted with the processing by the Data Controller and authorised to carry out the processing operations for the purposes indicated may become aware of such personal data.

The data may be disclosed to third parties delegated by ASPI to process the same data for the same purposes as set out in point 3 above, who will act as Data Processors pursuant to Article 28 GDPR, including the video surveillance system management and maintenance company. The full list of the persons appointed as Data Processors is available from the DPO.

Without prejudice to the above, the images will not be communicated or disseminated to third parties in any way, except for police and judicial purposes. In the presence of an offence or of the concrete danger of its occurrence, the powers assigned by law for such purposes to the public security and judicial authorities will be respected, which, by way of enforcement, may view the images. These entities will act as autonomous data controllers.

7. POSSIBLE TRANSFER ABROAD OF PERSONAL DATA

The management and storage of the Data shall take place on servers located in Italy; the Data Controller shall be entitled to use servers, located within the European Union, of third party companies, appointed as Data Processors.

The Data Controller does not intend to transfer Personal Data outside the European Union.

8. RIGHTS OF THE INTERESTED PARTIES

Lastly, we would like to inform you that Articles 15-22 GDPR give data subjects the possibility of exercising specific rights; the data subject may obtain from the Data Controller: access to and deletion of data concerning him/her, the restriction of processing, as well as to obtain in a structured, commonly used and machine-readable format the data concerning him/her, pursuant to Art. 20 GDPR; since this is video-surveillance data, the right to rectification and integration of the same is not actually exercisable in view of the intrinsic nature of the data collected, since they are images collected in real time concerning an objective fact.

The data subject also has the right to object to the processing; in this case, the Data Controller reserves the right not to process the request, and thus to continue processing, if there are compelling legitimate grounds for processing that override the interests, rights and freedoms of the data subject.

The above rights may be exercised by making a request to the Data Protection Officer (DPO) without formalities at dpo@pec.autostrade.it.

Pursuant to Article 77 of the GDPR, the data subject is always entitled to lodge a complaint with the Data Protection Authority if he or she considers that a processing operation concerning him or her violates the legal provisions pro tempore in force on the protection of personal data.

9. AMENDMENTS TO THIS NOTICE

ASPI reserves the right to make changes and updates over time, where necessary, to this Information Notice, giving notice of this to its own personnel, by means of publication on the website www.autostrade.it, and to the personnel employed by the companies awarded the service through the third-party companies indicated in point 3 above.

Data controller

Autostrade per l'Italia S.p.A.