Azienda Metalli Laminati spa

Strada Alessandria 16
15044 Quargnento (AL)
P.IVA 06529320159
PEC: aziendametallilaminatispa@arubapec.it

PRIVACY NOTICE – VIDEO SURVEILLANCE

pursuant to Article 13 of Regulation EU 2016/679 (GDPR) and art. 3.1 of the Provision dated 08.04.2010 concerning video surveillance of the Italian Data Protection Authority - EDPB Guidelines 3/2019 on the processing of personal data through video devices Version 2.0 Adopted on 29/01/2020

AZIENDA METALLI LAMINATI S.P.A. has installed a video surveillance system inside their premises, in compliance with the rules on data protection and the "Statuto dei Lavoratori" (Italian Law 20 May 1970, n. 300 and subsequent amendments).
All the areas under video surveillance are covered by signs that warn of the presence of the system, placed in such a way that the subject is warned before entering the area.



DATA CONTROLLER
According to Articles 4 and 24 GDPR the Data Controller is:
AZIENDA METALLI LAMINATI S.P.A., with registered office in Strada Alessandria 16 15044 Quargnento (AL).
e-mail: privacy@kme.com



DATA PROTECTION OFFICER
AZIENDA METALLI LAMINATI S.P.A. has appointed a Data Protection Officer ('DPO'), according to art. 37-39 GDPR. The DPO may be contacted for matters relating to the data processing, including the exercise of data subject's rights, at dpo.aziendametallilaminatispa@kme.com.



TYPE OF PERSONAL DATA PROCESSED
The personal data processed are the images of all persons entering the monitored areas.

PURPOSE OF DATA PROCESSING	LEGAL BASIS	DATA RETENTION PERIOD	NATURE OF DATA PROVISION
Personal data are processed in order to guarantee integrity of the corporate asset and people's security. The processing is also aimed at preventing unlawful acts and supporting judicial authorities or judicial police for identifying those responsible for these acts. Employees' personal data may not be used for the contestation of charges of a disciplinary nature.	Pursuant to Article 6, paragraph 1, letter f) GDPR, the legal basis of the processing is identified in the LEGITIMATE INTEREST of the Data Controller. Authorization of the National Labour Inspectorate.	Personal data are kept for up to 96 hours on IT support systems, without prejudice to any additional needs for storage in connection with public holidays, office closures or specific investigation request from a legal authority or legal police force. After the expiry of that period, the personal data will be automatically deleted from the system.	Data Controllers provided surveillance signs that indicate the presence of cameras before their range. The data subject is able to avoid surveillance or adapt his or her behaviour if necessary. If he or she decides to enter the monitored area the provision of personal data is essential.



ACCESS TO PERSONAL DATA – DATA COMMUNICATION
The data provided will be processed by employees and collaborators of the Data Controller, and/or employees and collaborators of other companies of the KME Group, in their capacity of persons authorized to process data pursuant to art. 29 GDPR, as well as communicated and processed by third parties, appointed as Data Processors pursuant to art. 28 GDPR or System Administrators, using manual and IT tools in such a way as to guarantee security and confidentiality.

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Communication of your personal data is mainly made to the Authority in charge of the control and monitoring of security and third parties/addressees that, also on behalf of the Data Controller, deal with the security of the places in which work takes place or which manage, on its behalf, guard activities. The third parties/addressees perform their activities in compliance with specific legal obligations, with which the Data Controller must comply, through them. Any communication for different purposes will be subject to your consent.



DATA TRANSFER
The data will not be transferred outside the European Union.



DATA SUBJECT'S RIGHTS
Your rights pursuant to articles 15, 16, 17, 18 and 20 GDPR encompass the following:

- Right to access
- Right to rectification
- Right to erasure
- Right to restriction of processing
- Right to object to processing
- Right to data portability

At any time and free of charge, with no particular formalities for your request, you can:

- obtain confirmation of the data processing performed by the Data Controller;
- access your personal data and know their origin (when the data is not obtained from you directly), the purposes and aims of the processing, the data of the subjects to which it will be disclosed, the time for which your data will be kept or the criteria useful to determining this;
- update or rectify your personal data so as to ensure that it is always exact and accurate;
- erase your personal data from back-up and other databases and/or archives of the Data Controller if, amongst other situations, it is no longer necessary for the purpose of the processing or if this is assumed to be unlawful and as long as the legal conditions are met; and in any case if processing is not justified by another equally legitimate reason;
- limit the processing of your personal data in some circumstances, for example where you have challenged its exactness, for the period necessary to the Data Controller to verify its accuracy. You must be informed, in time, also of when the suspension period has expired or the cause for the limitation to processing ceased applying and, therefore, said limitation has been revoked.

The Data Controller must proceed in this sense without delay and in any case at the latest within a month of receiving your request. The terms may be extended by two months, if necessary, considering the complexity and number of requests received by the Data Controller. In these cases, the Data Controller shall, within a month of your request, inform you and make you aware of the reasons for the extension.

You can exercise the rights under articles 15-22 of the GDPR in the following ways:

- sending an e-mail to privacy@kme.com or a certified e-mail to aziendametallilaminatispa@arubapec.it;
- contacting the DPO at dpo.aziendametallilaminatispa@kme.com;
- sending a written request to the Data Controller's registered office.

In addition, it is always possible to submit a complaint to the competent Supervisory Authority (art. 77 GDPR).