Extended information notice: Video surveillance at Tinexta Group premises

INFORMATION NOTICE

Pursuant to Article 13 of Regulation (EU) 2016/679 (the "GDPR").

This notice supplements the information provided on the signs displaying the simplified information notice and displayed near the video surveillance areas at the Tinexta Group headquarters. With registered office in Rome, Piazzale Flaminio no. 1/B ("Video Surveillance System"), we hereby inform you that:

1. DATA CONTROLLER

The Tinexta Group company whose premises/spaces the data subject is located in carries out the detection and recording of images/videos through the Video Surveillance System. Each company is the data controller for its own area of competence (hereinafter referred to as the "**Company**" or the "Data Controller"). The company details of each Tinexta Group entity acting as a data controller are indicated in **Annex 1** to this policy.

2. DATA PROTECTION OFFICER

Each Company has appointed its own data protection officer ("**Data Protection Officer**" or "**DPO**").

The DPO of each Company can be contacted via certified e-mail at dpo_tinexta@legalmail.it, or by writing to: Data Protection Officer – Tinexta S.p.A., Piazzale Flaminio n. 1/B, 00196 – Rome (RM).

3. DEFINITION OF PERSONAL DATA AND INFORMATION RELATING TO PROCESSING ACTIVITIES

Pursuant to the GDPR, personal data means: "*any information relating to an identified or identifiable natural person; a natural person is considered identifiable if they can be identified, directly or indirectly, with particular reference to an identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to their physical, physiological, genetic, mental, economic, cultural or social identity*" (the "**Data**").

Through the Video Surveillance System installed for the purpose of protecting company assets, the Data Controller may collect and process the following categories of Data relating to you:

i. Images/videos;
ii. date and time of recording;
iii. location.

Use of the video surveillance system will comply with current regulations, balancing the protection of dignity and privacy with the protection of company assets.

If you are an employee or collaborator of the company, the system will also be used in accordance with the Workers' Statute, particularly Article 4, paragraph 3 of Law No. 300 of 1970. We reiterate that the video surveillance system is not installed for the purpose of remotely monitoring workers' activities, but exclusively for the purposes set out in paragraph 4 below.

In any case, the Data Controller undertakes to ensure that the information collected and used is appropriate for the purposes indicated below, and that it does not constitute an invasion of your privacy.

4. PURPOSE OF THE PROCESSING AND RELATED LEGAL BASIS

a. Protection of company assets

Your Data is processed by each Company for the purposes of protecting company assets and for any defense and investigation requirements in the event of illegal activities. The processing is therefore necessary for the pursuit of the Company's legitimate interest related to the aforementioned purpose and will be based on the condition of lawfulness referred to in Article 6, paragraph 1, letter f) of the GDPR.

5. COMMUNICATION OF DATA TO THIRD PARTIES

The Data Controller may communicate your Data to third parties who provide them with services that are necessary, functional, or in any case connected to the aforementioned purposes.

In particular, your Data may be communicated to subjects who offer auxiliary services for the purposes of managing/maintaining and using the Video Surveillance System. The updated list of data processors is kept by each Data Controller and is available upon request.

The Data Controller may also disclose your Data to third parties to whom disclosure is required by law and/or to public administrations. In the event of requests received by the Company from the Judicial Authorities and/or Judicial Police within the scope of their respective powers of investigation and prevention of illegal activities, your Data may be disclosed to the aforementioned Authorities for this purpose.

6. TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

Your Data will not be transferred to entities established in countries outside the European Economic Area.

7. RETENTION PERIOD

The Data Controller will process/retain your Data for a period of 5 (five) days from the detection/recording of images relating to you via the Video Surveillance System. In the event of specific requests from the Judicial Authorities and/or Judicial Police, your Data may be retained for a longer period, corresponding to the time necessary to respond to requests from the aforementioned Authorities.

8. RIGHTS OF THE DATA SUBJECT

During the period in which the data controller processes your data, you may exercise the following rights at any time:

- Right of access: You have the right to obtain confirmation as to whether or not your data is being processed, and where applicable, the right to receive all information relating to such processing.

- Right to erasure: in certain circumstances, you have the right to obtain the erasure of your data, unless it is requested by the competent authorities and must therefore be retained.
- Right to restriction of processing: under certain conditions, you have the right to obtain restriction of the processing of your data.
- Right to data portability: under certain circumstances, you have the right to obtain the transfer of your data in our possession to another data controller.
- Right to object: where applicable, you have the right to object to the processing of your data based on the condition of lawfulness of legitimate interest, unless there are further legitimate reasons for continuing the processing.
- Right to lodge a complaint with the supervisory authority If the data controller refuses to comply with your requests to exercise your rights under the GDPR, the reasons for the refusal will be provided. Where applicable, you have the right to lodge a complaint, as described in paragraph 9 below.

The above rights may be exercised vis-à-vis the Data Controller by contacting the DPO at the above addresses. Please note that, with regard to the images recorded, the right to update, rectify, or supplement the data cannot be exercised in practice, given the intrinsic nature of the data collected, as these are images collected in real time and, as such, cannot be rectified by the Data Controller. The exercise of your rights as a data subject is free of charge pursuant to Article 12 of the GDPR.

9. COMPLAINTS

If you wish to make a complaint about the way in which your Data is processed by the Data Controller, or about the handling of a request you have made, you have the right to lodge a complaint directly with the Supervisory Authority.

Annex 1:

1) **Tinexta S.p.A.**, with registered office in Rome (RM), Piazzale Flaminio no. 1/B, 00196, Tax Code and VAT no. 10654631000, in the person of its *pro tempore* legal representative;

2) **Tinexta Infocert S.p.A.**, a company subject to the management and coordination of Tinexta S.p.A., with registered office in Rome (RM), Piazzale Flaminio n. 1/B, 00196, Tax Code and VAT No. 07945211006, in the person of its *pro tempore* legal representative;

3) **Tinexta Innovation Hub S.p.A.**, a company subject to the management and coordination of Tinexta S.p.A., with registered office in Correggio (RE), Corso Mazzini n. 22, 42015, Tax Code and VAT No. 02182620357, in the person of its *pro tempore* legal representative;

4) **Tinexta Cyber S.p.A.**, a company subject to the management and coordination of Tinexta S.p.A., with registered office in Rome (RM), Piazzale Flaminio n. 1/B, 00196, Tax Code and VAT No. 15971011000, in the person of its *pro tempore* legal representative;

5) **Queryo Advance S.r.l.**, a company subject to the management and coordination of Tinexta S.p.A., with registered office in Quartu S. Elena (CA), Via Sorrento n. 6, 09045, Tax Code and VAT No. 03570580922, in the person of its *pro tempore* legal representative;

6) **Forvalue S.p.A.**, a company subject to the management and coordination of Tinexta S.p.A., with registered office in Milan (MI), Via Meravigli n. 7, 20123, Tax Code and VAT No. 03176511206, in the person of its *pro tempore* legal representative;

7) **Tinexta Visura S.p.A.**, a company subject to the management and coordination of Tinexta S.p.A., with registered office in Rome (RM), Piazzale Flaminio no. 1/B, 00196, tax code and VAT no. 05338771008, in the person of its *pro tempore* legal representative;