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PERSONAL DATA PROCESSING PRIVACY NOTICE VIDEO SURVEILLANCE AND VEHICLE ACCESS CONTROL
Pursuant to Article 13 of Regulation (EU) 2016/679 ("GDPR")

INTRODUCTION

ITAFILON S.r.l. considers personal safety, the protection of company assets and the protection of personal data to be fundamental elements of its organisation. In accordance with Regulation (EU) 2016/679 ("GDPR"), Italian Legislative Decree No. 196/2003 and applicable employment legislation, ITAFILON S.r.l. uses video surveillance systems and technological access control tools on its premises, adopting measures to ensure that personal data are processed in accordance with the principles of lawfulness, fairness, transparency, data minimisation, purpose limitation, storage limitation, integrity and confidentiality.

This privacy notice describes the essential features of the processing carried out through these systems.

1. DATA CONTROLLER

ITAFILON S.r.l.

Via Giacomo Puccini n. 5 – 24060 San Paolo d'Argon (BG)

Tax Code and VAT No. 03942330162

REA BG – 442706

Certified email (PEC): itaflon@progettostudio.legalmail.it

Email: info@itaflon.it

2. DATA SUBJECTS

The processing may concern any individuals who enter or pass through the areas covered by the systems, including:

- employees and other staff;
- customers and their contact persons;
- suppliers, consultants and maintenance personnel;
- visitors;
- drivers and other individuals entering the company premises.

3. PERSONAL DATA PROCESSED

The following data may be processed through the systems:

- images of individuals captured by the cameras; images of vehicles; **vehicle registration numbers**, where captured by the number plate recognition system; the date, time and information associated with vehicle entry and exit, where recorded by the system.

No audio is recorded, unless the system is configured otherwise, in which case the lawfulness of such recording must be assessed in advance and data subjects must be duly informed.

4. PURPOSES AND LEGAL BASES

Purpose	Description	Legal basis
Safety of individuals and security of company premises	Preventing and managing situations that may compromise the safety of individuals present on the premises.	Article 6(1)(f) GDPR – the Data Controller's legitimate interests in ensuring the safety of individuals and the security of its premises.
Protection of company assets	Preventing and investigating unauthorised access, damage, theft and other events detrimental to company property, equipment and facilities.	Article 6(1)(f) GDPR – legitimate interests in protecting company assets.
Vehicle access control	Capturing the registration numbers of vehicles entering and leaving the premises to enable vehicle recognition and operation of the access barrier.	Article 6(1)(f) GDPR – legitimate interests in regulating, securing and managing access to company premises.
Establishment and protection of rights	Using recordings, where necessary, to reconstruct specific events and to establish, exercise or defend legal claims.	Article 6(1)(f) GDPR – legitimate interests in protecting the Data Controller's rights.

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Processing is based on a balancing of the interests pursued by ITAFILON S.r.l. against the fundamental rights and freedoms of data subjects. The data subject's consent is not required.

5. NUMBER PLATE RECOGNITION SYSTEM AND VEHICLE ACCESS

A technological system capable of reading vehicle registration numbers is used at the entrance to and exit from the company premises. The data are captured to manage and regulate vehicle access and, in particular, to identify vehicles for the purpose of **operating the entry and exit barriers**. Data collected through this system are not used for purposes incompatible with those stated in this privacy notice.

6. VIDEO SURVEILLANCE AND WORKERS

The systems may cover areas through which employees and other staff of ITAFILON S.r.l. pass or in which they work. Processing is carried out in accordance with the applicable provisions on personal data protection and the protection of workers, with particular reference to Article 4 of Italian Law No. 300 of 20 May 1970 (Workers' Statute). Equipment that may also enable remote monitoring of workers' activities is installed and used in accordance with the conditions and procedures laid down by applicable legislation. Images are not used for purposes additional to or incompatible with those lawfully pursued, without prejudice to uses permitted by the legislation in force.

7. PROCESSING METHODS AND ACCESS TO IMAGES

Processing is carried out using electronic and IT systems and by methods strictly related to the stated purposes. Access to recorded images and other data collected through the systems is restricted to individuals expressly authorised and instructed by ITAFILON S.r.l., within the scope of their respective duties and on a need-to-know basis. External parties providing support and maintenance for the equipment who have access to personal data are, where the relevant conditions are met, appointed as data processors pursuant to Article 28 GDPR. ITAFILON S.r.l. implements appropriate technical and organisational measures to prevent unauthorised access, loss, alteration, disclosure or unlawful use of the data.

8. DATA RETENTION PERIOD

Recorded images are retained **for 24 hours**. Once this period has elapsed, recordings are automatically deleted by overwriting, unless further retention is necessary in connection with a specific event, a request from a judicial or public security authority, or the establishment, exercise or defence of legal claims. In such cases, only recordings relevant to the event will be retained, and only for the time necessary to deal with it. Any data recorded by the number plate recognition system will be subject to a specific retention period proportionate to the purpose of access control.

9. RECIPIENTS OF THE DATA

The images and other data collected are not made publicly available.

Where provided for by law and where necessary, they may be disclosed to:

- judicial authorities;
- police forces;
- other public authorities legally entitled to request them;
- consultants and professional advisers, where necessary for the establishment or defence of legal claims.

The data may also be processed by suppliers providing technical support and maintenance for the systems, in accordance with their applicable role under data protection law.

10. TRANSFERS TO THIRD COUNTRIES

Data collected through the video surveillance and access control system are processed using the technical arrangements adopted by ITAFILON S.r.l. and are not transferred to countries outside the European Economic Area (EEA).

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11. RIGHTS OF DATA SUBJECTS

In the circumstances and within the limits laid down in Article 15 et seq. GDPR, data subjects may exercise the rights applicable to the processing, in particular:

- the right of access to their personal data; the right to erasure, where the relevant conditions are met; the right to restriction of processing; the right to object, on grounds relating to their particular situation, to processing based on the Data Controller's legitimate interests.

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Given the nature of the processing, certain rights may not be applicable in practice to video recordings; in particular, the right to rectification cannot normally be exercised in relation to recorded images. Requests may be addressed to ITAFILON S.r.l. using the contact details provided in section 1. Data subjects also have the right to lodge a complaint with the Italian Data Protection Authority.

12. FIRST-LAYER PRIVACY NOTICE

Areas under video surveillance are appropriately marked by information signs placed before individuals enter the cameras' field of view, providing essential information on the processing and a reference to this full privacy notice.

13. UPDATES TO THIS PRIVACY NOTICE

This privacy notice was last updated on 11 August 2026 – Rev. 01. ITAFILON S.r.l. reserves the right to update or amend this privacy notice if there are changes to the equipment, the purposes or methods of processing, the systems used or applicable legislation. Any material changes will be communicated to data subjects in a manner appropriate and proportionate to the nature of the changes.

Date of issue: 11/08/2026

ITAFILON S.r.l.

The Data Controller

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