

### **Personal data processing policy (long version) regarding data collected by video surveillance cameras**

In order to comply with art. 13 of the EU Regulation 2016/679, *concerning the protection of natural persons with regard to the processing of personal data and on the free movement of such data*, (hereinafter also the "Regulation"), we inform you that the rooms and/or areas listed below, are monitored by surveillance cameras. The data controller is Gruppo UNA S.p.A. (hereinafter, the "Company"), with headquarters in Milan, in Via Gioacchino Murat, no. 23, postcode 20159.

Surveillance camera activities involve the processing of images and video recordings of visitors who enter the rooms or pass through the area where the systems are installed.

The sole purposes of this data processing are:

- 1) to ensure that the Company's property is safeguarded;
- 2) to guarantee that places and individuals are safe;
- 3) if necessary, to legally protect rights.

For the purposes indicated above, data processing is therefore necessary to pursue the Company's legitimate interests and is carried out based on the relevant measures and precautions as specified by the Italian Data Protection Authority.

The systems may allow images to be recorded: in this case, images would be kept for a period of no more than 24 hours (in some cases, for example when rooms are closed, they may be stored for 72 hours).

Personal data will be processed using automated means and suitable security measures will be adopted. Only authorised staff can access personal data; staff from companies providing maintenance, security and portering services, insofar as strictly necessary to provide such services, are authorised to view images and to perform maintenance work. The authorised parties perform the abovementioned operations on the basis of authorisation from the Data Controller or the Data Processor and are duly trained in this regard. The procedures to access the data are supervised by a Video Surveillance Officer, or their delegate.

Personal data may be disclosed, if necessary, to external suppliers, if they are hired to provide security, portering and systems maintenance services.

In such cases, the data processing is entrusted to the abovementioned suppliers after a data processing agreement is adopted with them, as Data Processors, in order to ensure compliance with the principles set out in data protection laws, and to guarantee the utmost protection of the data subjects' rights.

When requested, or if necessary for the abovementioned purposes, the data may be disclosed to judicial authorities and the judicial police, as well as to external professionals (e.g. lawyers) who may be entrusted with the judicial protection of the Company's rights.

Privacy laws (articles 15-22 of the Regulation) guarantee the data subject the right to:

- i. obtain confirmation of processing, to access personal data regarding them at any time, and to learn the purposes of processing, the categories of data involved and of recipients of disclosed information, the origin of the data, and the length of time for which the data will be stored;
- ii. have data integrated and/or rectified, if it is inaccurate or incomplete;
- iii. cancel data, if it has been processed unlawfully or for longer than the established storage time periods;
- iv. oppose its processing for legal reasons relating to your particular situation;
- v. limit processing, in other words to have the controller perform operations aimed exclusively at data storage, if this appears essential to legally protect one of the data subject's rights, in the event the latter makes a request to rectify or oppose processing.

The "Data Protection Officer" is available, besides to exercise the rights established by data protection laws, also if there are any doubts or queries, as well as to provide an updated list of data recipient categories: the Data Protection Officer can be contacted at the Company's headquarters, at the email address [privacy@gruppouna.it](mailto:privacy@gruppouna.it). Furthermore, your right as data subject to lodge a complaint with the Italian Authority, the Privacy Guarantor, remains unaffected, if it is considered necessary in order to protect your personal information and your rights in this matter.