



OFFICINE AMBROGIO MELESI & C. S.R.L.

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Cap.Soc./Share Cap. €500.000 i.v.
P.IVA - C.F. - R.I. Lecco:
IT 00231630138
R.E.A. n. LC-108835
N.Mecc./Export n. LC005895

PRIVACY POLICY ON VIDEO SURVEILLANCE

With this information, pursuant to the provisions of Article 13 of the GDPR, we wish to inform you about the processing of your personal data acquired and processed through the video surveillance system operating at Officine **Ambrogio Melesi & C. S.r.l** in compliance with the applicable legislation on the protection of personal data.

1. Data Controller and Data Protection Officer (DPO)

The Data Controller is the company **OFFICINE AMBROGIO MELESI & C. S.r.l., with registered office in Cortenova (LC) Largo De Vecchi**

No. 11, in the person of the pro tempore Legal Representative.

The company has appointed the "Data Protection Officer" provided for by the Regulation (so-called DPO) pursuant to Chapter IV, Section 4, of the GDPR. For all questions relating to the processing of your Personal Data and/or to exercise the rights provided for by the Regulation itself, you can contact the DPO at the following e-mail address: gdpr@melesi.it.

2. Purposes of processing and legal bases

Personal data will be processed with the aim of ensuring the protection, protection and security of company assets and people, representing a useful deterrent against any criminal events, thus excluding any possibility of exercising any form of remote control of workers.

The processing of data, in accordance with the provisions of the Workers' Statute (art. 4, law no. 300/1970) was authorized by trade union agreement of 30/07/2025, available to all employees.

The processing is carried out for the pursuit of the legitimate interest of the Data Controller relating to the protection of the assets and resources that work at the place of work. In relation to the provisions of the provision of the Italian Data Protection Authority on video surveillance of 8 April 2010 and EDPB Guidelines 3/2019 and any subsequent amendments and additions, the consent of the interested parties is not required for the pursuit of the purposes of protecting company assets and protecting and safety of people.

3. Types of data subject to processing

In relation to the purposes of the data processing referred to in the previous paragraph, only Personal Data from the video surveillance system, i.e. images from the aforementioned circuit, will be processed.

It should be noted that the provision of data is necessary as it is strictly instrumental to access to company premises.

Failing this, the Owner will find it impossible to give you access to the premises themselves. In relation to the provisions of the Provision of the Italian Data Protection Authority on video surveillance of 8 April 2010 and EDPB Guidelines 3/2019 for the pursuit of the purposes of protecting company assets and protecting and protecting people, the consent of the interested parties is not required.

4. Methods of data processing and storage

The consultation of the images must take place only for the purposes indicated above, excluding any form of continuous control relating to the method of execution of the work performed by employees and will only be allowed by the owner or by personnel specifically identified and authorized by formal letter of appointment.

For the video surveillance system, please refer to the trade union agreement of 30/07/2025 with its annexes.

The video surveillance system allows the simple viewing of images in real time and their recording.

The images taken through the video surveillance system are viewed only by the owner or by persons specifically appointed by him in writing.

The areas under video surveillance are marked with a special sign.

As regards storage times, the data are stored for a maximum duration of 7 days, except in the case of special needs for further storage in relation to holidays or closure of offices and services, as well as in the event that it is necessary to comply with a specific investigative request from the Judicial Authority or the Judicial Police.

At the end of the retention period, the images are automatically deleted by overwriting.

The application of the security measures and the Provision of the Italian Data Protection Authority on video surveillance of 9 April 2010 and EDPB Guidelines 3/2019 is also guaranteed.



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Dissemination and categories of recipients of data

The data collected through the video surveillance system will not be disseminated and will only be viewed by personnel in charge. The data may be communicated to third parties, contractually bound to the owner and exclusively for the achievement of the purposes expressed or in order to comply with contractual or legal obligations, belonging to the following categories: external parties in charge of the management/maintenance/administration of the video surveillance system, subjects entrusted with the concierge and surveillance service, subjects entrusted with the security service, any professionals who support the company with consulting or legal activities.

In addition, the images can be provided to the police and/or judicial authorities, in case of request. The data will be stored in Italy. The list of any data processors is constantly updated and available at the Data Controller's headquarters.

Rights of the data subject

You have the right to access your data at any time, pursuant to art. 15-22 GDPR. In particular, you may request the rectification, cancellation, limitation of the processing of the data in the cases provided for by art. 18 of the GDPR, as well as the right to lodge a complaint with the Data Protection Authority or to take legal action (Articles 77 and 79 of EU Regulation 2016/679).

The rights referred to in Articles 15-22 of EU Regulation 2016/679 may be exercised by giving written notice to the Data Controller or DPO at the following e-mail address: gdpr@melesi.it.

In the event that access to the footage is attributable to a specific investigative request by the Judicial Authority or the judicial police, the Data Controller or authorized personnel will facilitate the consultation of the images taken without delay, fulfilling a legal obligation to which the Data Controller is subject.

Changes to the privacy policy

The owner reserves the right to modify, update, add or remove parts of this privacy policy at its discretion and at any time, by giving notice to it.

**The Data Controller Officine Ambrogio
Melesi & C. S.r.l**