

INFORMATION ON PERSONAL DATA PROCESSING THROUGH THE VIDEO SURVEILLANCE SYSTEM AT THE IIT PREMISES IN VIA MOREGO 30 - GENOA

This is to inform you, pursuant to EU Regulation 2016/679 on "*Protection of individuals with regard to the processing of personal data and the free movement of such data*" and to Italian Legislative Decree 196/2003 as amended (hereinafter jointly "Regulation"), about the data processing carried out through the video surveillance system by Fondazione Istituto Italiano di Tecnologia ("IIT"), via Morego n. 30, and the further communication of the images to the Judicial Authorities.

1. Identity and contact details of the Data Controller

The Data Controller of your personal data is **Fondazione Istituto Italiano di Tecnologia**, based in Via Morego, 30 - 16163 Genova – Phone +39 010 28961.

2. Contact details of the Data Protection Officer

The Data Protection Officer is available at the following e-mail address: dpo@iit.it

3. Description of the data processing

The video surveillance system records in the premises of IIT and may take images (hereinafter "**images**" or "**data**") concerning people (as for example employees, visitors, suppliers etc) who are located into the cameras angle.

4. Purposes of data processing

At the IIT premises in via Morego 30 a video surveillance system has been installed for the protection of assets against theft, damage, vandalism and for fire prevention purposes: 13 video cameras have been installed, and distributed in the following areas:

- 1 video camera within the warehouse for the ICT Directorate, located on Floor 0, where electronic equipment of significant economic value is stored, as a security measure against theft, damage or vandalism, and for fire prevention purposes.
- 1 video camera within IIT's Animal Facility, located on Floor -1, 1 as a deterrent against theft, damage or vandalism and for fire prevention purposes, as well as for ensuring the safety of workers.
- 11 video cameras within the external transit areas, where toxic and flammable gas storage, waste storage, and power generator are located, as deterrent against theft, damage or vandalism, as well as for safety reasons.

5. Lawfulness of data processing

The legal basis of the data processing is article 6, par. 1, point f) of the Regulation (*processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data*).

In particular, IIT pursues a legitimate interest against theft, damage or vandalism and for fire prevention purposes through the data processing for security and safety purposes. In compliance with the provisions of the Regulation, IIT proceeded to carry out a balancing test to verify the applicability of the legal basis of legitimate interest, from which it emerged that it does not prevail over the rights and freedoms of the data subjects.

The legal basis of data communication to the Judicial Authorities is art. 6, par 1, point c) of the Regulation (compliance with a legal obligation).

6. Processing Method

Personal data will be processed by informatics assets, following the rules on protection of personal data, including those related to data security.

At this purpose, guarantees provided in the sector of labor law and regulated by Italian Law no. 300/1970 "Statuto dei Lavoratori" as amended are applied (ref. Genoa Labor Territorial Direction Authorization n. 1/2012, Amendment of the Genoa Labor Territorial Direction Authorization n. 078/42475/2015).

Anyone who transit through the areas covered by the range of the video cameras, internal and external, are informed about the presence of the video cameras (and, consequently, about the collection of data) through the affixing of dedicated signs, that indicate the purpose of the collection.

7. Access to Data

Data will be processed by authorized persons to process personal data appointed by IIT.

8. Categories of recipients of Data

Data may be communicated to external Data Processors appointed by IIT pursuant to Article 28 of the Regulation.

In any case, IIT remains responsible to communicate the data to Judicial Authorities, to handle the requests.

9. Transfer of Data to extra European Union countries

Data will not be transferred to extra European Union countries.

10. Data storage

The storage of personal data will take place in compliance with the security measures adopted by IIT on data protection, and access to them will be allowed only to the staff involved and duly authorized to process personal data.

Data retention is 24 hours from registration, except for special needs for further retention in relation to holidays or closure for holidays or other reasons, in any case always contained below 168 hours.

11. Rights of the data subject

Each data subject may exercise the rights provided in Articles 15, 17, 18 and 21 of the Regulation at any time by contacting the Data Protection Officer, at the contact data at point 2 of this information note.

In particular, data subjects can request:

1. access to their personal data, as provided in Article 15 of the Regulation;
2. cancellation of their personal data ("*right to be forgotten*"), as provided in Article 17 of the Regulation;
3. restriction of personal data processing, as provided in Article 18 of the Regulation.

Furthermore, each data subject can object to the processing of data at any time, pursuant to Article 21 of the Regulation, in case one of the situations mentioned in Article 6, paragraph 1, point e) and f) of the same Regulation occurs.

12. Complaint with a Supervisory Authority

Finally, pursuant to Article 77 of the Regulation, we remind that data subjects have the right to lodge a complaint with a Supervisory Authority (for Italy: Garante per la Protezione dei dati personali - Website: www.garanteprivacy.it - e-mail: protocollo@gpdp.it – Phone +39 06 696771), if they believe that the data processing infringes the provisions of the Regulation.

13. Nature of the processing and obligation of providing Data

Many of the data required are necessary to define and provide continuation to the relationship established with IIT. In some cases, failure to provide these data may result in conclusion of the said relationship.

14. Existence of automated decision-making processes in the data processing

There is **NO** type of automated decision-making process, pursuant to Article 22 of the Regulation for the processing of the above data.