

# DISCLOSURE REGARDING THE PROCESSING OF THE PERSONAL DATA OF VISITORS PURSUANT TO (EU) REGULATION 2016/679 ("GDPR") AND NATIONAL LEGISLATION ON PRIVACY



# DATA PROCESSING CONTROLLER

MyRechemical S.r.l.,

Via di Vannina 88/94, 00156 Rome – Italy; Tax ID, VAT 15892671007 Certified public e-mail address myrechemical@legalmail.it ("Company").



#### PERSONAL DATA PROCESSED

Name, surname, place and date of birth and other elements indicated in the identification document, as well as the image displayed and/or recorded through the closed-circuit video surveillance systems in operation at the Company's offices.



#### MINIMUM DISCLOSURE

Closed-circuit video surveillance systems are in operation at the Company's offices, suitably marked before their relative range with special signs. The cameras are installed outside and inside the premises and record the access gates and the areas around the perimeter of the building.



# PROCESSING PURPOSES



# LEGAL BASIS FOR PROCESSING



## DATA RETENTION PERIOD

Purposes related to the identification of the person concerned as a visitor at the premises of the controller and control of physical access (including video surveillance) to ensure the security of persons and property and management of audit activities.

Legitimate interest (Protection of the company and its assets and prosecution of any type of legally relevant offence)

#### Video surveillance:

24 hours from the time the images were recorded, without prejudice to special requirements for further storage in connection with holidays or closure of offices or businesses, as well as in the event of compliance with a specific request investigation by a judicial or police authority. In any case, the recordings are never kept for more than one week. The video recordings may be kept for a longer period if they are necessary to ascertain, exercise or defend the rights of the Data Controller in judicial and extrajudicial proceedings.

# Physical access control, other than video surveillance

For the duration of the visit and for a maximum period of 5 years from the last entry/exit recording.



#### **DATA SUPPLY**

Mandatory: refusal to provide data precludes entrance of the data subject to the controller's offices as a visitor. Access to video surveillance areas involves the collection, recording, storage and, in general, use of the images of the persons concerned.



### **CATEGORIES OF DATA RECIPIENTS**

The Data may be communicated to individuals/entities operating as data **controllers**, such as supervisory and control authorities and any public entities entitled to request data, such as judicial and/or public security authorities.

The Data may be processed, on behalf of the controller, by external parties designated as **data processors**, such as companies that provide control and surveillance services and companies that provide maintenance services for the video surveillance system.

## PARTIES AUTHORIZED FOR PROCESSING





The Data may be processed by employees and collaborators of the Company belonging to departments responsible for the pursuit of the aforementioned purposes that have been expressly authorized for processing and have received adequate operating instructions.

## RIGHTS OF DATA SUBJECT - COMPLAINTS TO THE CONTROL AUTHORITY

By contacting the Group Corporate Affairs, Governance and Compliance function via e-mail at <a href="mailto:privacy@groupmaire.com">privacy@groupmaire.com</a>, data subjects may request the controller to provide access to the data concerning them, correct inaccurate data, integrate incomplete data, delete data and limit the processing in the cases indicated in art. 18 of the GDPR¹, where applicable; they may also oppose the processing of all or part of the data required for the pursuit of the controller's legitimate interest, at any time.



The right to data portability pursuant to art. 20 of the GDP cannot be exercised as the processing is pursued in the legitimate interest of the controller.

With reference to the images recorded, the right to update, rectify or supplement, as well as the right to rectify as per art. 16 of the GDPR cannot be exercised due to the intrinsic nature of the data (images collected in real time of an objective event).

A data subject may also request to view the images which he/she believes portray him/her by producing or attaching the appropriate identification documents with/to the request. The reply to a request for access shall not include any data relating to any third party, unless the breakdown of the processed data or the removal of certain elements renders the personal data relating to the data subject incomprehensible. Once the above retention periods have expired, access requests will no longer be honored.

Data subjects are entitled to lodge a complaint with the competent supervisory authority.

# By signing, I declare to have received and acknowledged the Disclosure relative to the processing of my personal data. Legible Surname and name \_\_\_\_\_\_\_ Signature \_\_\_\_\_\_, on \_/\_/\_\_\_

<sup>&</sup>lt;sup>1</sup> The right to limitation of the processing consists in the temporary submission of the data to the storage operation only, in the following cases provided for by art. 18 GDPR:

a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;

b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;

d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.