



**Information on the Processing of Personal Data, pursuant to Article 13 of EU Regulation No. 2016/679 "GENERAL DATA PROTECTION REGULATION" (hereinafter "GDPR"), and Legislative Decree 196/2003 as amended by Legislative Decree 101/2018**

With this information notice, we wish to inform you about how our Company, ROSORETTO S.S.A. (hereinafter the Company or ROSORETTO), processes the images collected by the video surveillance system active at the premises. This information is published on the ROSORETTO.com website under the Privacy Policy section. Unless otherwise specified, all legal references in this document pertain to the GDPR.

**1. Data Controller**

The Data Controller is ROSORETTO S.S.A., with VAT No. IT03340090046 and registered office at Via Alba Monforte 76, Castiglione Falletto (12060 - CN).

**2. DPO Appointment**

The Controller, not falling within the cases indicated in Article 37, nor in those specified in various interpretations by the Supervisory Authority, has not deemed it necessary to appoint a Data Protection Officer.

**3. Subject of Processing**

The processing concerns images of your person captured by the video surveillance system installed at the Controller's premises.

**4. Purpose of Processing, Legal Basis, Nature of Data Provision**

The purposes of processing, as indicated in section 3, are the protection of company assets and the need, for security reasons, to track all individuals within or in the immediate vicinity of the company's perimeter. The processing is lawful pursuant to Article 6(1), letters (c), (d), (f).

**5. Processing Methods, Data Retention Period**

Your personal data is processed through the operations listed in Article 4(2) of the GDPR, specifically: collection, recording, storage, communication, deletion, and destruction. Your personal data is subject to electronic and/or automated processing. The recordings are stored in accordance with legal provisions for 48 hours, unless different requirements arise due to emergency situations.

**6. Access to Data**

Your data may be made accessible for the purposes mentioned in section 4 to employees and collaborators of the Controller, in their capacity as authorized processors and/or system administrators, or to third-party companies or other subjects authorized by the Controller, in their capacity as external data processors. These processors commit to implementing all appropriate security measures to protect your data and adhere to a protocol of procedures and security policies that the Controller has established and continuously updates.

**7. Data Communication**



Without the need for explicit consent (pursuant to Article 6(b), (c) of the GDPR), the Controller may communicate your data, as indicated in section 3, to supervisory bodies, judicial authorities, and those subjects to whom communication is required by law for the purposes indicated in section 4 or for specific purposes of the requesting entities. These subjects will process the data as independent data controllers. Your data will not be disseminated.

## **8. Data Transfer**

The recordings mentioned in section 3 are stored in electronic format on servers located at the Controller's premises.

It is understood that the Controller, if necessary, may transfer the servers outside the EU, for instance, in the case of using Cloud services. In such cases, the Controller ensures that the transfer of data outside the EU will be carried out in compliance with applicable legal provisions, including the signing of standard contractual clauses approved by the European Commission.

## **9. Data Subject Rights**

ROSORETTO guarantees your company the exercise of the rights provided by law for data subjects and ensures cooperation in response to specific requests from data subjects. However, unless otherwise agreed with your company, ROSORETTO does not guarantee the direct exercise of rights by data subjects. In such cases, ROSORETTO will only forward the request from the data subject to your company.

Data subjects have the rights set out in Articles 15, 16, 17, 18, 19, 20, 21, and 22 of the GDPR, including:

- Right of access
- Right to rectification
- Right to erasure ("right to be forgotten")
- Right to restriction of processing
- Right to notification in case of rectification or erasure of personal data or restriction of processing
- Right to data portability
- Right to object
- Rights related to automated individual decision-making, including profiling

## **10. How to Exercise Data Subject Rights**

Each data subject may exercise their rights at any time by sending:

- A registered letter with acknowledgment of receipt addressed to the Data Controller, as specified in section 1
- An email to [info@rosoretto.com](mailto:info@rosoretto.com)

*ROSORETTO S.S.A.*