

**NOTICE ON THE PROCESSING OF PERSONAL DATA
IN RELATION TO THE USE OF VIDEO SURVEILLANCE SYSTEMS
PURSUANT TO ART. 13 EU REGULATION 2016/679 (GDPR) AND APPLICABLE ITALIAN LAW**

EU Regulation 679/2016 ("GDPR") and the applicable Italian legislation regulate the protection of natural persons with regard to the processing of personal data, in compliance with the principles of fairness, lawfulness, and transparency. These regulations impose a series of obligations on those who process information referring to other individuals.

In compliance with the obligations set out in Article 13 of the GDPR regarding the need to inform data subjects and provide the necessary information to ensure the fair and transparent processing of personal data, this privacy notice is provided. The Data Controller reserves the right to make changes at any time, providing notice to the data subjects through its website.

This notice supplements the simplified information provided to data subjects by signs placed before the range of surveillance cameras installed within the premises of the Data Controller.

DEFINITIONS

The GDPR defines "personal data" as any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more elements characteristic of their physical, physiological, genetic, mental, economic, cultural, or social identity.

"Special categories of personal data" are those revealing: health status, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or data concerning genetic, biometric, sexual life or sexual orientation, or judicial data.

"Processing" means any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

DATA CONTROLLER

The Data Controller is **GI.GI.PA S.R.L.**, with registered office at Via Giovanni Porzio 4, Centro Direzionale Isola G1, Naples, ZIP 80143, and operational office at Via Torina 4, Capri (NA), ZIP 80076, Tax Code and VAT no. 08818241211, represented by the legal representative pro tempore. The contact details of the Data Controller are as follows:

GI.GI.PA S.R.L.

Registered Office: Via Giovanni Porzio 4, Centro Direzionale Isola G1, Naples - ZIP 80143

Operational Office: Via Torina 4, Capri (NA) – ZIP 80076

Phone: +39 081 17763078

Email: gigipasrl@gmail.com

Certified Email (PEC): gigipa@legalmail.it

TYPES OF DATA COLLECTED

The personal data processed by the Data Controller using video surveillance systems installed at its operational site consists of images that may depict the data subject if they enter the range of the surveillance cameras.

PURPOSES OF PROCESSING AND LEGAL BASIS

The processing of personal data is carried out for the following purposes, as provided for by the GDPR, the Decision of the Italian Data Protection Authority on video surveillance dated April 8, 2010, and the Guidelines 3/2019 of the European Data Protection Board (EDPB) dated 10/07/2019:

- Protection of the assets of GI.GI.PA S.R.L. through video surveillance systems that record images;
- Protection of the safety of clients, employees, visitors, and individuals legitimately authorized to access the premises of GI.GI.PA S.R.L. through video surveillance systems that record images.

The processing does **not** aim to monitor employees remotely, and the images recorded will not be used in any disciplinary procedures against employees.

The legal basis for the above purposes is the legitimate interest of the Data Controller pursuant to Article 6(1)(f) of the GDPR and the performance of a task carried out in the public interest pursuant to Article 6(1)(e) of the GDPR.

PROCESSING METHODS AND DATA RETENTION

The images captured by the cameras forming the video surveillance system, transmitted to a server and recording devices located within the Data Controller's premises in a space accessible only to authorized personnel, are processed using electronic/IT tools in full compliance with legal provisions, according to the principles of lawfulness, necessity, purpose limitation, relevance, and data minimization.

The processing of images, including their deletion, is carried out using security measures designed to ensure the confidentiality of the data subject and prevent unauthorized access by third parties or unauthorized personnel, in accordance with the Italian Data Protection Authority's decision on video surveillance dated April 8, 2010.

Data will be retained for no longer than necessary for the purposes for which they are collected and processed, and in any case for no more than **48 hours**. Data will be protected – even in the event of technical maintenance or support – by appropriate security procedures.

All personal data will be processed exclusively by personnel who, by role or hierarchical position within GI.GI.PA S.R.L., are authorized to do so. Responsibilities are clearly assigned, and data access levels are defined by procedures and operating instructions for authorized staff, who are appropriately trained and constantly updated on privacy-related matters, potential risks, and responsibilities regarding data processing.

Should a data breach occur that is likely to result in a high risk to the rights and freedoms of individuals, the Data Controller will notify affected data subjects without undue delay (Article 34 GDPR).

RECIPIENTS OF THE PROCESSING

Images may be communicated to entities that, strictly under the law, are entitled to access the data, such as law enforcement or competent authorities in the case of criminal activity.

In any case, images will not be disclosed or communicated to third parties except as outlined above.

DATA SUBJECT RIGHTS

To exercise the rights under Articles 15 to 22 of the GDPR, the data subject may contact GI.GI.PA S.R.L. by submitting a request to the legal representative pro tempore at one of the contact points listed above.

The data subject has the right to access their data at any time. In particular, they may request rectification, erasure, restriction of processing in the cases provided for, withdrawal of consent, and data portability. The data subject may also object to the processing by stating the reasons justifying the objection. GI.GI.PA S.R.L. is legally required to respond within one month.

The exercise of rights is, in principle, free of charge, except for potential reproduction costs.

The Controller has the right to request information necessary for the identification of the applicant.

The data subject also has the right to lodge a complaint with the Supervisory Authority pursuant to Article 77 of the GDPR or to seek judicial remedy under Article 140-bis of the Italian Data Protection Code, as amended by Legislative Decree No. 101/2018.

NAPLES, JUNE 2025

THE DATA CONTROLLER