

PRIVACY POLICY STATEMENT – LUTECH VIDEO SURVEILLANCE

PURSUANT TO ART. 13 OF REGULATION (EU) 2016/679

Data Controller	Data Protection Officer (DPO)
The Data Controller is: LUTECH S.p.A. Via Dante, 14 - 20121 Milan (MI) – VAT no. 02824320176, in the person of its acting legal representative who is domiciled at the office of the Company.	The Data Protection Officer (DPO) of Lutech S.p.A. can be contacted at the following email address: DPO@lutech-group.com

Purposes of the processing

Due to requirements to protect the company assets of Lutech S.p.A., in some areas of the car park and in other areas of the **property of Cologno Monzese via Milano 150**, closed-circuit video surveillance systems are in operation, without audio recording, appropriately identified before the respective range of action by way of specific signs in accordance with applicable regulations.

The Company processes the images displayed and/or recorded by way of the video surveillance systems, of persons who access the premises as follows:

Purposes and Legal Basis	Categories of Recipients:
Protection of public safety, prevention and assessment of offences Legal Basis: Legitimate interest, safeguarding	The data may be processed by private surveillance companies and by any public entity legitimated to request the data, such as the judicial authority and/or public safety authority.
of vital interests	as the judicial authority and/or public safety authority.
Protection of company assets Check of critical alarm situation	The data may be processed by private surveillance companies
Provision of maintenance services	and by maintenance companies of the video surveillance system.
Legal Basis: Legitimate interest	

Authorised Processors

The data will be processed exclusively by personnel whose company functions involve the pursuit of the purposes indicated above, who have received adequate operating instructions and who have been expressly authorised to process personal data.

Data Storage Period (Images)

24 hours from the time the images were recorded.

Once that period has elapsed, the images are erased and overwritten on the system with new images.

Rights of the Data Subject - Complaints to the Supervisory Authority

The GDPR, as well as guaranteeing the right to lodge a complaint with the Supervisory Authority, which, for Italy, is the Autorità Garante per la protezione dei dati personali, grants the following rights:

- **Right of access** (art. 15): The Data Subject may obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed and may obtain further information, including the purposes of the processing, the categories of personal data and the recipients.
- **Right to erasure** (art. 17): The Data Subject may request the erasure of personal data concerning him or her where one of the grounds provided by that article applies, including: withdrawal of consent, unlawful processing and exercise of the right of defence.
- **Right to restriction** (art. 18): The Data Subject may obtain the restriction, configurable as a total or partial suspension of the data processing or even in some cases an immobilisation of the same. This may be requested only in exceptional cases expressly determined by the rule, including the period enabling the controller to verify the accuracy of the personal data, unlawful processing, exercise of a right during judicial proceedings.
- **Right to data portability** (art. 20): The Data Subject has the right to ask that the data concerning him or her are transmitted, in the exercise of his or her rights, in an easily comprehensible format.
- **Right to object** (art. 21): The Data Subject may, on grounds related to his or her particular situation, object to the processing concerning him or her pursuant to Art. 6 paragraph 1, points e) and f).
- Right not to be subjected to automated processes (art. 22): The Data Subject may object to being subject
 to a decision based solely on automated processing which produces legal effects concerning him or her or
 similarly significantly affects him or her.

The **Right to rectification** (art. 16) cannot be exercised in view of the intrinsic nature of the data processed (images recorded in real time concerning an objective fact).

In noting that your rights should be exercised within the storage periods indicated above, if you decide to exercise them, we inform you that your personal data will be communicated by the Controller to the processing recipients for the connected fulfilments (art. 19 of the GDPR).

If you have any doubts or require clarifications and also to exercise your rights, please contact us by writing to the following address: https://lutech.group/privacy-rights