

EXTENDED DISCLOSURE ON THE PROCESSING OF PERSONAL DATA ACQUIRED THROUGH THE CORPORATE VIDEO SURVEILLANCE SYSTEM

This disclosure is provided pursuant to Article 13 of Regulation (EU) 2016/679 (hereinafter “GDPR”) to all data subjects (including employees, contract staff, interns, customers, suppliers, etc.) whose personal data may be processed following the installation of the video surveillance system at the premises of KE Protezioni Solari S.r.l., located in Noventa di Piave (VE), at Via Calnova 160/A, Via Volta 26 and Via Volta 30.

This disclosure supplements the first-level disclosure, provided through clearly visible and appropriate signage (video surveillance notice) posted before entering the area subject to video surveillance.

The system is installed and managed in accordance with the principles of lawfulness, fairness, transparency, data minimisation, and retention limitation under the GDPR.

Recordings may occasionally capture individuals present on the premises, including workers. In these cases, the images are acquired on an occasional basis, without this constituting remote control of work activities, pursuant to Article 4, paragraph 1 of Italian Law No. 300 of 20 May 1970 (Workers’ Statute).

1. Data Controller

The Data Controller is Ke Protezioni Solari S.r.l. (hereinafter, also referred to as the “*Company*” or “*Data Controller*”) based in Noventa di Piave (VE), Via Calnova 160/A, tax code and VAT No. 02178490278.

To exercise your rights or for any request for clarification, you may contact the Data Controller at:

- e-mail: amministr@keitaly.it;
- Tel: +39 0421 307000.

2. Personal Data processed

The data processed consists exclusively of video images acquired using video surveillance cameras. No audio is recorded.

3. Purpose of processing

This processing is carried out to safeguard corporate assets and meet the Data Controller’s organisational and operational needs, as authorised by the Labour Inspectorate – Metropolitan Area of Venice.

4. Legal basis for processing

This processing is based on the following grounds:

- pursuant to Article 6, para. 1, letter f) GDPR: the Data Controller’s legitimate interest in protecting corporate assets and managing organisational and operational needs;
- pursuant to Article 6, para. 1, letter c) GDPR: compliance with legal obligations following requests from Legal Authorities or Law Enforcement.

5. How data is processed

Images are captured via continuous recording (24/7) and are stored on an NVR system protected by appropriate technical and organisational security measures.

6. Data retention period

Images are retained for a period of 72 hours, except for any extensions related to bank holidays, company closings or investigative requests from the Legal Authorities or Law Enforcement. After this period, the images are automatically and permanently overwritten.

7. Data recipients

Access to the images is granted to the Data Controller, to authorised and formally appointed parties, and to the security company appointed as External Data Processor.

The data will not be disseminated and will not be disclosed to third parties, except to Law Enforcement or Legal Authorities where a specific and justified request has been made.

8. Data transfer

The processing of your data does not involve the transfer to non-EU countries and/or international organisations outside the European Economic Area, as data is stored on servers of the Data Controller and/or third parties located within the European Union.

9. Data subjects' rights

Pursuant to Articles 15-22 of the GDPR, as a data subject, you have the right to:

- obtain confirmation as to whether or not personal data concerning you is being processed;
- if processing is ongoing, have access to the data and information relating to the processing, and request a copy of your personal data;
- request the rectification of inaccurate data or have incomplete personal data completed without undue delay;
- obtain the erasure of your personal data, if any of the conditions set forth in Article 17 of the GDPR apply;
- obtain the restriction of data processing, in the cases set forth in Article 18 of the GDPR;
- be informed of any rectification, erasure or restriction carried out on your data;
- object at any time to the processing of your personal data, on grounds relating to your particular situation;
- not be subject to automated decision-making, including profiling;
- lodge a complaint with the Data Protection Authority, if the processing breaches the GDPR, according to the procedures available on the Authority's website: www.garanteprivacy.it.

To exercise your rights and for any further clarification or information, you may contact the Data Controller at any time using the contact details provided above, preferably by sending a request to the dedicated email address:

Noventa di Piave,

Signature