

PRIVACY POLICY

pursuant to Arts. 13 and 14 of EU Regulation 679/2016 and applicable privacy provisions

VISITORS

Introduction

Pursuant to and for the purposes of EU Regulation 679/2016 on the protection of personal data ("**Regulation**") and any other EU or national provision and/or regulation applicable to the protection of personal data, **TECON S.R.L.**, Strada 1 Palazzo CC 20057 Assago (MI), e-mail: tecon@teconsrl.it; tel. 0292882150, as Controller ("**Company**" or "**Controller**"), informs you that the personal data ("**Data**") provided by you when accessing the Company's facilities, or previously communicated to the Company by third parties, is processed in compliance with the following.

1. Categories of personal data and related sources

The Data communicated to the Company by third parties (e.g. employers, educational institutions, organisations) refer to personal details, identity and contact details and is necessary for organising and managing access to the Company's facilities.

2. Purposes and legal basis for the processing

The Controller collects and processes your personal data for the purpose of controlling access to the Company's offices and facilities, for the protection of the Company's assets, as well as for the purposes of personal safety and security, including by means of a video surveillance system. Below, we explain in more detail the purposes for which the Data is processed, as well as the legal basis legitimising the processing thereof.

The Company processes the Data for the following purposes:

- (i) allow you to enter the Controller's premises following the issue of a badge, in compliance with the access procedures established by the Company.

The legal basis for data processing, in this case, is the fulfilment of the contractual obligations and pre-contractual commitments arising from the data subject's request for access to the premises;

- (ii) ensure the protection of the Controller's premises and corporate assets, including using an external video surveillance system, exercise the Controller's rights in court and manage any disputes, as well as the prevention and suppression of unlawful acts.

The legal basis for the processing is the pursuit of a legitimate interest of the Controller;

- (iii) ensure your safety and security within the Controller's premises.

The legal basis for the processing is the pursuit of a legitimate interest of the data subject;

- (iv) purposes connected with the fulfilment of obligations established by law, regulations, national and EU legislation and provisions issued by authorities empowered to do so by law.

The legal basis for the processing of Data for this purpose is the fulfilment of obligations provided for by law and applicable regulations, also regarding safety and security on Company premises.

3. Nature of data provision and consequences of failure to provide data

In order to carry out the above-mentioned purposes, the legal basis of which is the fulfilment of a contractual and/or legal nature, the processing of the Data is necessary and failure to provide it will result in the impossibility of access to the Company's facilities.

4. Categories of persons/entities to whom the data may be disclosed

The Data will not be disclosed; it may be communicated, for the above-mentioned purposes, to the following categories of persons: (i) companies belonging to the same Corporate Group as our Company; (ii) persons, companies, associations or professional firms that provide assistance, consultancy, and services to our Company, with particular but not exclusive reference to insurance, accounting, administrative, legal, tax and financial matters; (iii) companies providing services related to security, access control support, technical support, including for video surveillance systems; (iv) persons/entities to whom the right to access the Data is granted by provisions of the law and secondary regulations or by provisions issued by authorities empowered to do so by law. Persons/entities belonging to the above categories will use the Data as autonomous controllers or Processors.

These persons/entities may be established in EU and non-EU countries. If these persons/entities are established in non-EU countries, the Company shall adopt the measures provided for in the Regulation to legitimise the transfer of personal data to them.

The list of persons to whom the data is or may be disclosed, as well as an indication of the privacy measures adopted to legitimise the transfer of data to extra-EU entities, may be requested from the Company by contacting the addresses indicated in 'the 'Data subjects' rights' section.

The Data may also be brought to the attention of our personnel who will process it in their capacity as personnel in charge of data processing.

5. Data retention criteria

The Data will be processed for as long as the visitors remain within our Company's premises, after which it will be retained in accordance with the ordinary limitation periods set forth in the Italian Civil Code or specific legal provisions, for administrative purposes and/or to assert or defend a right or legitimate interest, and it will be deleted when the purposes for which it was collected no longer apply. Data collected through the video surveillance system will be retained for a period of 48 hours from the time of collection and then overwritten, unless further retention is necessary for purposes related to the right of defence of the Company or third parties.

6. Data subjects' rights

We inform you that, in the cases expressly provided for in the Regulation, you may exercise the rights set out in Art. 15 et seq. of the Regulation and precisely you may:

- (i) request confirmation that the Data is being processed and, if so, ask the Controller for access to information relating to such processing;
- (ii) request that incomplete or inaccurate Data is rectified;
- (iii) request the Controller to delete the Data;
- (iv) request the restriction of the processing;
- (v) request to receive, in a commonly used and machine-readable format, the Data concerning you or to obtain that such Data is transmitted directly to another controller, where technically feasible (so called '*data portability*').

In addition, you have the right to object, either wholly or partially, for legitimate reasons, to the processing of the Data that concerns you.

The aforementioned rights may be exercised by sending a request to the e-mail address: tecon@teconsrl.it.

Finally, if you consider that the processing of the data provided violates data protection legislation, you have the right to lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it).

7. Policy Update

This policy was updated in May 2024.

The Controller

Tecon S.r.l.