

VIDEO SURVEILLANCE OF COMPANY LOCATIONS

PRIVACY POLICY PURSUANT TO ARTS. 13 AND 14 OF EU REGULATION NO. 679/2016 (GDPR) AND TO THE PROVISION OF THE DATA PROTECTION AUTHORITY (APRIL 8, 2010)

DATA CONTROLLER AND CONTACTS

The Data Controller is Azienda Trasporti Milanesi S.p.A. (ATM) with registered office in Foro Buonaparte 61, 20121, Milan (Italy). The Data Protection Officer, whom you can contact to exercise your rights under art. 13 and/or for any clarifications regarding personal data protection, can be contacted at the following email address: rpd@atm.it.

PURPOSE OF THE PROCESSING AND LEGAL BASIS

The purpose of the processing video surveillance is:

- a. "protection of assets"
- b. "control of the exercise" (including the safety of workers and customers)

The legal basis are:

- for **ATM Group workers**, the art. 4 of Law 300/70, together with the trade union agreement of 17th of December 2020. The agreement strictly excludes the control of workers in the workplace in any case. The images cannot be used for disciplinary purposes, except crime's hypothesis;
- for **third parties**, legal basis is a legitimate interest pursuant to art. 6 par. 1 letter f) of EU Regulation 679/2016 (protection of assets), and the performance of a task of public interest or related to the exercise of public authority, which is vested in the holder (safety and security), pursuant to art. 6 par. 1 letter e) of EU Regulation 679/2016 and conduct implying an intent.

CATEGORIES OF DATA PROCESSED AND RECIPIENTS

Pictures and video footage are handled. The data are processed by authorized personnel formally appointed by the data controller, and may be communicated to law enforcement agencies and judicial authorities.

METHODS OF PROCESSING AND POSSIBLE TRANSFER OF DATA

The data are processed only for the purposes mentioned above and according to the principles of lawfulness, correctness, transparency, accuracy, integrity and confidentiality, established by the regulations in force. No personal data collected will be transferred outside the European Economic Area.

DATA RETENTION PERIOD

The data will be deleted by default in 7 days. In any cases, the images can be kept as provided above.

DATA SUBJECT RIGHTS

All the rights of the data subject are guaranteed in accordance with the provisions of Articles 15, 16, 17, 18, 20, 21, 22 and 77 of the GDPR.