Privacy Notice Regarding the Processing of Personal Data via Video Surveillance System (pursuant to Art. 13 of EU Regulation 2016/679)

We wish to inform you about the processing of your personal data, in accordance with Art. 13 of EU Regulation 2016/679 (GDPR), the Provision dated 8 April 2010 on video surveillance by the Italian Data Protection Authority (Garante), and the EDPB Guidelines 3/2019 on the processing of personal data through video devices, dated 29 January 2020.

The Data Controller has installed a video surveillance system both outside and inside the company premises in compliance with personal data protection regulations. Signs are displayed in the monitored areas to inform data subjects of the presence of the system before recording takes place. Cameras are located at vehicle and pedestrian access points, elevators serving the various floors, and the related corridors.

Therefore, pursuant to Art. 13 of the aforementioned Regulation, we provide the following information:

a) Data Controller
The Data Controller is **Iforum srl**, with registered office in Rome, Via Fernando Colombo n. 36, VAT no. 16032451003.

b) Data Protection Officer (DPO)
The Data Protection Officer (DPO) is **Mr. Andrea Vertua**, who can be contacted at our registered office or via email at **privacy@iforumroma.com**.

c) Processed Data and Purposes of Processing
Any processing of personal data will take place in compliance with the principles set out in Art. 5 of the GDPR (lawfulness, fairness, transparency, adequacy, relevance, necessity, and proportionality). The processed data consists of images of individuals within the cameras' field of view. These images are processed exclusively to protect company assets, ensure the safety of employees, collaborators, and visitors, and safeguard the physical integrity of individuals operating within or present in our environments. The filming and recording system is designed for both the prevention of unlawful behavior and malicious events (theft, damage, vandalism, other offenses against persons or property) and for investigative purposes as a means to assist Law Enforcement and/or Judicial Authorities in identifying those responsible for such acts.

d) Legal Basis for Processing
The legal basis for processing, pursuant to Art. 6, paragraph 1, letter (f) of the GDPR, is the necessity for Iforum s.r.l. to carry out processing for the pursuit of a **legitimate interest** corresponding to the purposes indicated above.

e) Processing Methods and Retention Period
Processing is carried out using electronic tools. Data is stored on digital media for **48 hours**, or for the strictly necessary longer duration resulting from public holidays or company closures. At the end of the retention period, the images will be automatically deleted by the system, except in cases where they must be retained to fulfill specific requests from authorized parties.

f) Mandatory/Optional Nature of Data Provision
The provision of data is inherent to accessing the monitored areas and is, therefore, necessary. Before entering the cameras' field of vision, passers-by are warned via specific signage that they are entering a video-surveillance area; therefore, if they do not wish to be filmed, they must refrain from accessing the area.

g) Rights of Data Subjects
You are guaranteed the exercise of the rights set forth in Art. 15 et seq. of EU Regulation no. 679/2016, as well as the right to lodge a complaint with the Supervisory Authority pursuant to Art. 77.

h) Communication of Data
Images may be processed by duly trained and instructed internal personnel (pursuant to Art. 29 GDPR and Art. 2-quaterdecies of Legislative Decree 101/2018), external security companies formally appointed as Data Processors, or by System Administrators pursuant to the Provision of the Guarantee dated 27.11.2018.

i) Transfer of Personal Data Abroad
The footage is not subject to transfer to Non-European countries or to international organizations.

j) Updates
This notice may be supplemented with further information, also in light of regulatory changes or provisions from the European Commission and the Data Protection Authority.