

# PRIVACY NOTE

## Information for visitors accessing the premises of Turboden S.p.A.

This information is provided, pursuant to art. 13 GDPR 2016/679 - "European Regulation on the Protection of Personal Data", to visitors, guests and, in general, to all persons accessing TURBODEN S.p.A.'s premises.

### Identity of the Data Controller

The Data Controller is TURBODEN S.p.A., in the person of its pro tempore legal representative, with head office at via Cernaia 10 - 25124 Brescia.

### Contact details of the DPO (Data Protection Officer)

The DPO can be reached at the headquarters of the Data Controller, or contacted by e-mail at [DPO@turboden.it](mailto:DPO@turboden.it).

### Data source

The personal data processed are provided by data subjects on the occasion of:

- visits or interventions at the premises, offices, warehouses and branches,
- interviews or work sessions at the premises, offices, warehouses and branches,
- delivery or collection of goods, packages, correspondence.

### Processed data

The main common personal data collected and processed by TURBODEN S.p.A. fall into the following categories: personal identification data, contact details, images and videos (in particular: name, surname, address, telephone number, any data shown on identity documents).

### Purpose of processing

The above personal data are processed for the following purposes:

- control of access to the premises,
- detection of permanence inside the premises,
- identification of those present for the management of emergency situations.

### Legal basis for processing

The personal data of the guests are lawfully processed for the execution of a legal obligation (management of emergencies as per legislative decree 81/2008) and for the legitimate interest of the Data Controller (access control and detection of permanence inside the premises for security reasons).

### Data recipients

The personal data processed by the Data Controller are not disseminated, i.e. they are not disclosed to unspecified persons, in any possible form, including making them available or simply consulting them.

The data may be processed by employees, on the basis of their roles and duties, and by collaborators of the Data Controller for the pursuit of the purposes indicated above.

These subjects have been authorised to process the data and have received adequate operating instructions.

They may also be communicated, to the extent strictly necessary, to subjects who, for the purpose of processing your requests, must supply goods or perform services on behalf of the Data Controller, who have been appointed as Data Processors.

In particular, the data will be processed by an external company to which the Data Controller has entrusted the reception management service.

Finally, the data may be communicated to the subjects entitled to access them by virtue of provisions of the law, regulations and Community legislation.

### Transfer of data

In no case does the Data Controller transfer personal data to third countries or to international organisations.

However, it reserves the possibility of using cloud services; in which case, the service providers will be selected from among those who provide adequate guarantees, as provided for in Article 46 GDPR 2016/679.

### Rights of the Data Subjects

The Data Subjects may exercise the rights provided for in the GDPR 2016/679 at any time, in particular:

- the right of access (art. 15): to request confirmation of the processing of your data and possibly a copy of the personal data in our possession and to verify the lawfulness of the processing;
- the right of rectification (Art.16): to request the rectification of the personal data we hold on you. This allows you to have the incomplete or inaccurate data in our possession corrected, although it may be necessary to verify the accuracy of the new data you have provided;
- the right to erasure (Art. 17): requesting that we erase or remove your personal data if there are no valid reasons for continuing to process it or following the exercise of the right to object (see below), in the event of unlawful processing of your data or when we are required to erase your personal data to comply with applicable law. Please note, however, that we may not always be able to comply with your request for erasure due to specific legal obligations which will be communicated to you, if applicable, at the time of your request;
- the right to restriction of processing (art.18): requesting the suspension of the processing of your personal data in the following cases:
  1. verification of the accuracy of the data;
  2. in the event of unlawful use of the data but you do not want us to erase them;
  3. if you request us to retain the data (which we do not need to retain) for the purpose of establishing, exercising or defending legal claims; or
  4. if you have objected to our use of your data but we need to verify whether there are overriding legitimate reasons for using it;
- the right to portability (art.20): request to transfer your data in an intelligible format to another entity indicated by you.
- the right to object to the processing of your personal data (Art. 21);
- the right to object to automated decision-making processes (Art. 22).

In particular, the Data Controller recalls that any Data Subjects may exercise the right to object in the forms and ways provided for in Article 21 GDPR.

The Data Subjects may exercise their rights by writing to the Data Controller at the above address, or by email, specifying the subject of the request, the right they intend to exercise and attaching a photocopy of an identity document attesting to the legitimacy of the request.

### Data retention

Acquired and recorded data will be deleted one year after access, the images from the video surveillance system, where present, will be deleted 72 hours after recording, unless extensions are provided to comply with collaboration obligations in the event of investigative requests from judicial or police authorities.

### Refusal to provide data

The provision of data by the person concerned is optional. However, refusal to provide data means that access to the site is not possible.

### Automated decision-making processes

In no case does the Data Controller carry out processing operations that consist of automated decision-making processes on personal data.

The information is also available on our website: [www.turboden.com/privacy](http://www.turboden.com/privacy)