







**INFORMATION CONCERNING THE TREATMENT OF PERSONAL DATA
BASED ON EU REGULATION 2016/679 (“GDPR”)**

	DATA CONTROLLER	Amico & Co Srl Via dei Pescatori 16128 - Genoa, Italy (“the Company ”)
---	------------------------	---

We inform you that in order to control the accesses to the shipyard and all other Amico & Co company property, the company, as well as guarding the entrances, has installed a video surveillance system. Surveillance activities are carried out in compliance with the current regulations in force, including GDPR and the Privacy Code (Law decree 196/2003), as well as the measures of the Personal Data Protection Authority, and in respect of the rights and respect for the fundamental rights and freedoms of natural persons

	PERSONAL DATA PROCESSED
	Identification data indicated on the visitor’s ID document shown at the entrance, as well as the numberplate of their vehicle. Furthermore, images visualized using the operational video surveillance system are also processed (“ Data ”).

	PURPOSE OF PROCESSING		LEGAL GROUNDS FOR PROCESSING		DATA RETENTION PERIOD
	VIDEO SURVEILLANCE Physical access control for the safety of persons and company assets as well as compliance with legal obligations to which the Company is subject.		<ul style="list-style-type: none"> Legitimate interest (protection of the safety of persons and company assets) 		Images are retained for a total of around 48 hours at the end of which they are overwritten unless there are specific needs for further retention, for example where a specific investigative request is made by the Judicial or Police Judicial Authority.
	VISITOR REGISTRATION Physical access control through identification of all those who enter. As far as visitors are concerned, identification occurs by the examination of an ID document and by checking the vehicle numberplate.		<ul style="list-style-type: none"> Legitimate interest (protection of the safety of persons and company assets) 		Occasional visitor data is cancelled as soon as a visitor leaves the premises. Regular visitor’s data is retained for the entire length of the relationship between Amico & Co and the visitor’s employer, or up until the moment in which it is communicated that the visitor need not enter any longer. Also in these cases, data can be retained for longer periods due to a specific investigative request is made by the Judicial or Police Judicial Authority.

	CONFERMENT OF THE DATA
	<p><u>Video surveillance:</u> The presence of suitable signs allows people transiting in the area under video surveillance to be aware of the presence of surveillance cameras before they enter into their radius of action, and therefore they are able to decide whether to enter or not. Entering into the radius of action of the cameras, the concerned subjects are aware that they are being filmed. However, should a person refuse to transit in the areas that are filmed, this could result in them being denied entry to the shipyard and other company property.</p> <p><u>Visitor registration:</u> Mandatory: refusing to confer one’s data regarding identification in order to be registered at the entrance leads to it being impossible to permit a visitor access to the premises.</p>

	DATA RECIPIENTS
	Data can be communicated to subjects who operate as data processors , as well as subjects who are qualified to request data (Judicial Authorities and/or Port Authority).



Data will also be processed, on behalf of the Data Controller, by subjects who are persons designated as per art. 28 of GDPR as **data processors**, providing the technical support and maintenance service of the video surveillance system.

Data will not be transferred nor distributed outside of Italy.



SUBJECTS AUTHORIZED TO PROCESS DATA AND MODALITY OF DATA PROCESSING

Data can be processed by employees and/or associates of the Company and by the regularly authorised data processors who have received suitable operative instructions in compliance with art. 29 of GDPR.

Data processing will be carried out via hard and/or digital copies, by the use of tools and procedures suitable for guaranteeing safety and the security and confidentiality, in compliance with the provisions in force concerning the protection of personal data.



SUBJECT RIGHTS: COMPLAINTS TO THE SUPERVISORY AUTHORITY

By contacting the Company by e-mail using privacy@amicoshipyard.com, subjects can exercise their rights foreseen by GDPR, where applicable, and in particular request that the Data Controller allow them to access their own personal data, to request its correction, the updating of incomplete data, cancellation of data and request the limitation of data processing in the cases foreseen by art. 18 of GDPR, as well as opposing, at any time, entirely or partially for reasons connected to their particular personal situation, the processing of data necessary for the pursuit of the legitimate interest of the holder.

Furthermore, subjects have the right to present a complaint to the Personal Data Protection Authority; to contact the Authority, consult their website www.garanteprivacy.it.