



FIERA MILANO CONGRESSI

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Socio Unico Fiera Milano S.p.A.

Direzione e coordinamento di Fiera Milano S.p.A.

Sede legale:

Piazzale Carlo Magno n. 1,

20149 Milano, Italia

Capitale sociale

euro 2.000.000,00

Registro Imprese di Milano, **P.I.** n. 11292010151

REA MI n. 1452160

Information pursuant to Article 4 of Law No. 300/1970 and Article 13 of Regulation (EU) 2016/679

We inform you that Fiera Milano Congressi S.p.A. (hereinafter "**FMC**" or the "**Company**") has installed a video surveillance system at the congress venue located in Piazzale Carlo Magno 1, Milan (the "**Venue**"). The installation took place for reasons of safeguarding and protecting the safety of individuals, the security of the congress venues, and the Company's property and assets from possible theft, robbery or vandalism, as well as the possible defense of rights, including those of third parties, in court. The video surveillance system and the controls that, through it, may be carried out, may involve the processing of personal data of individuals who may have access to the Venue.

With this notice, FMC provides the following information regarding how the video surveillance system may be used and the controls that may be activated by means of this system, as well as the related processing of personal data.

Such data will be processed confidentially and in accordance with Regulation (EU) 2016/679 "*General Data Protection Regulation*" (the "**GDPR**") and further applicable data protection regulations.

1. Contoller's contact information

The data controller is Fiera Milano Congressi S.p.A. (also, the "**Controller**") with registered office in Piazzale Carlo Magno 1. You may contact the Controller by *email* at gdpr@fieramilanocongressi.it or by regular mail at the above address.

2. Video surveillance system

The video surveillance system (the "**System**") consists of the set of equipment (cameras, recording systems, connection devices) installed at the congress Venue.

The cameras of the System are fixed. Recording is active H24 and images will be stored locally on dedicated hard disk. The places subject to video surveillance are marked by the appropriate signs according to the simplified information models approved by the Italian Data Protection Authority.

3. Location of the System

The System consists of 565 cameras distributed as shown on the floor plan available at the Controller's registered office.

Specifically, the System is located in the external and internal areas of the convention center (entrances and exits, areas designated for parking and thoroughfares, thoroughfares, convention halls and exhibition areas).

4. Modes of use and how controls are carried out: parties who may have access to the images and the processing of related personal data

The recordings are accessible only (i) to the individuals appointed and identified in the agreement with the company trade union representatives; (ii) to additional individuals who may be involved in various capacities, always provided that the communication of the images and related personal data is pertinent to the functions exercised by the employees in question; (iii) to any professionals appointed by the Company such as, lawyers, expert *forensic* consultants.

During the investigation phase and before any criminal proceedings are initiated in the case of the commission of unlawful acts, the individuals who have access to the records are obliged to maintain confidentiality and not to disclose any data outside the individuals indicated by this paragraph and/or those expressly authorized by the individuals indicated in this paragraph.

Access from remote locations to real-time images is allowed to the above individuals only in exceptional cases.

5. Purpose and legal basis for processing

The System is installed for reasons of protection of the Controller's assets and security of the places that constitute its Venues. The images and related personal data will be processed for the following purposes:

- the detection of unlawful conduct;
- the protection of the rights of the Controller and/or third parties (including workers), where the recorded images would show the commission of unlawful acts unless the interests or fundamental rights and freedoms of the data subject outweigh these interests;
- all purposes related to the employment relationship, including disciplinary purposes.

The processing of personal data of individuals who access the Venue, and who are not employees (*e.g.* exhibitors, visitors, suppliers, etc.), is lawful under Article 6(1)(f) of the GDPR. Conversely, the processing of data relating to employees is lawful pursuant to Article 4 of the Workers' Statute (itself referred to in Article 114, Legislative Decree 196/2003 as amended and supplemented) and, in particular, on the basis of the agreement with the company trade union representatives dated September 10, 2024, having regard to organizational needs, the protection of safety and company assets.

In particular, Article 6(1)(f) of the GDPR identifies the legal basis corresponding to the need to pursue a "*legitimate interest of the controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.*"

Article 4 of the Workers' Statute identifies specific legitimate interests such as precisely organizational needs, health protection and company assets. The need to pursue such qualified legitimate interests, constitutes a valid legal basis for the processing to the extent that the requirements of the sector regulations are met (in the case of employees, the reaching of an agreement with the trade union representatives present in the company or, failing that, as in this case, the administrative authorization issued by the competent ITL).

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

The data collected and processed by the video surveillance System are necessary for the above purposes. Failure to process personal data may result in the inability to protect the Controller's assets and the security of its Venues; therefore, refusal to process the data may result in the inability to gain access to the Venues.

7. Retention period of personal data

The images are stored for a maximum period of 7 days after acquisition, taking into account the size of the convention center, the duration of the events and the peculiar activities carried out, subject to specific defense needs and requests from the Authorities, in a relevant and limited manner and in compliance with the relevant principles. Thereafter, the images are overwritten on the same medium unless evidence of unlawful conduct emerges. In this case, the images will be stored for the period necessary to protect the rights of the Controller and/or third parties (including workers), within the limits of the applicable statute of limitations, providing them to the competent authorities.

8. Data recipients

Personal data will be processed by the Company as data controller. The data will also be processed by the personnel appointed by the Company, in particular the personnel indicated in paragraph 4 above. The data may be disclosed to the following categories of recipients, within the scope of the above purposes:

- a) data processors, as appointed from time to time pursuant to Article 28 of the GDPR;
- b) Fiera Milano Group companies;
- c) companies and professionals hired by the Controller to carry out defensive investigations and/or in order to protect its own right (e.g., *forensics* experts, lawyers, private investigators, etc.);
- d) public and supervisory authorities.

The full list of such subjects or categories of subjects is available at the registered office of the Controller. In any case, your personal data will not be disseminated.

9. Transfer of personal data outside the European Union

Personal data, collected through the video surveillance System, will not be transferred outside the European Economic Area¹ (EEA).

10. Rights of the data subject

At any time, you may contact the Company to have full clarity on the operations we have referred to you and to exercise your rights under Articles 15 to 21 and 77 of the GDPR, in the manner and within the limits set forth in the same legislation. In particular, you may request the Controller, at any time in the manner and within the limits governed by the aforementioned legislation to:

- a) access to your personal data;
- b) request rectification of your personal data;
- c) if the processing was based on consent, revoke it at any time. In this case, the data processing carried out before revocation remains lawful;
- d) where possible, request the deletion of your personal data;
- e) receive in a structured, commonly used and machine-readable format personal data concerning you, as well as directly transmit your personal data to another data controller, if technically feasible;
- f) where possible, object to the processing of personal data about you;
- g) where possible, obtain a restriction on the processing of your personal data;
- h) propose a complaint to the Italian Data Protection Authority;
- i) requesting information about this:

¹ The 27 countries of the European Union, Iceland, Liechtenstein and Norway (EEA-EFTA countries) are part of the EEA.

- i. the purposes of processing;
- ii. the categories of personal data;
- iii. the recipients or categories of recipients to whom personal data has been or will be disclosed, particularly if personal data are transmitted to recipients in third countries or international organizations, and the existence of appropriate safeguards;
- iv. the retention period of personal data;
- v. where personal data are not collected from the data subject, all available information about their origin.

Any requests made, for the exercise of your rights, may be forwarded to the Controller by regular mail to the above address or by writing to the *e-mail* address indicated in paragraph 1 of this policy.

Milan, November 29th, 2024

Fiera Milano Congressi S.p.A.