



Assessment
of Privacy Impact for the installation
Video surveillance system

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The following Data Protection Impact Assessment (DPIA) is intended to provide the context, as well as the technical and security information adopted for the acquisition, processing and use of personal data collected as part of the installation of a video surveillance system, hereinafter referred to as Video Surveillance, in accordance with

- *The General Data Protection regulation (GDPR - EU Regulation 2016/6791) published in the European Official Journal on May 4, 2016 and entered into force on May 25, 2016, with effective application from May 25, 2018*
- *Article 4 of the Workers' Statute Law 300/70 - Audiovisual equipment and other control instruments*

or with

- Guidelines concerning data protection impact assessment as well as criteria for determining whether a processing operation "is likely to present a high risk" under Regulation 2016/679, adopted on April 4, 2017 (version subsequently amended and adopted on October 4, 2017)
- Criteria referred to an acceptable DPIA²
- It is considered to proceed to draft a per-personal data protection impact assessment in light of the potential risks to the rights and freedoms of individuals related to the processing of data with video surveillance tools (monitoring) and related soft-ware uses.

This document will be updated following regulatory and organizational changes.

1. Systematic description of processing

Given the Art. 35 paragraph 7 letter a, of the European privacy regulation in this assessment are defined:

1.1 Context and purpose of the treatment

The processing of recorded data is for the purposes of worker safety and protection of company assets.

Data controller: **Memc SpA** in the person of the legal representative

Data Processor: Domenico Rinaldi

1. http://ec.europa.eu/justice/data-protection/reform/files/regulation_oj_en.pdf

2. <http://www.garanteprivacy.it/DPIA>

1.2. Personal data subject to processing

The data collected will be of the following nature: images and videos collected through dedicated IP cameras.

The cameras installed record the common areas and the area reserved for the public (reception): they do not specifically record workstations and areas reserved for staff.

Therefore, they do not raise any critical issues in light of the prohibition to monitor the activities of workers (art. 4 of Law 300 of 1970).

The union agreement of 12/07/2019 in Novara and of 22/01/2021 in Merano has been signed.

1.3. Retention period

The original captured video images will be stored for a maximum period of 72 hours on a dedicated server.

1.4. Functional description of data flow and responsible persons

The network infrastructure adopted, as far as sensitive image data collected by the cameras is concerned, follows the dictates of the LAN network of Novara and Merano. Data security is guaranteed by the business continuity procedures of the two sites. The data are protected according to the control and verification procedures of the information systems and managed within the company's quality system.

Data Flow and Network Manager: Andrea Pronzello

1.5. Code of Conduct

A code of conduct has not yet been adopted at European or national level.

2. Assessment of necessity and proportionality of processing

Having regard to art. 35, paragraph 7, letter b we define the measures envisaged to comply with the regulation (art. 35, paragraph 7, letter d) for the Project taking into account the following.

2.1. Specific, explicit and legitimate purposes

The data are collected in an explicit manner, giving notice to people in the spaces through the appropriate signs and information and using the software released along with the equipment can be analyzed to understand the processing carried out, and legitimate, that is, not storing any personal data consistent with what is specified in Article 5(1), letter b (principle of "purpose limitation") and in accordance with Article 89, paragraph 1.

The data collected, according to the principle of "minimization of data" (art. 5(1), letter c), are adapted, relevant and limited to what is necessary and kept for a limited period (art.5(1), letter e) according to the principle of "limitation of storage".

See Section I.III "Retention Period" of this document.

2.2. Lawfulness of treatment

Given art 6(1), letter a-b-c-d-e-f, we indicate the appropriate lawfulness of treatment for the purpose of safety in the workplace, both for employees and customers, and protection of company assets and for, with reference to the Data Controller (letter e), "the execution of administrative and commercial management of which the data controller is responsible".

2.3. Rights of the interested parties

Having regard to art. 12, 13, 14 ("Information provided to data subjects"), art. 15 and 20 ("right of access and portability of data"), art. 16, 17 and 19 ("right of rectification and cancellation"), as well as art. 18, 19 and 21 ("opposition and limitation of processing"), art. 28 ("relations with re-processors") it is specified that the system adopted does not store any personal data and that in order to promote transparent and clear communication to protect the rights of those concerned, it is specified that appropriate visual signs will be adopted in the environments of experimentation, including indications of online resources and people to contact to obtain more information and to obtain access and the ability to verify the data.

Specifically, the following measures will be taken:

- notice of the cameras through information signs on the standard model approved by the Guarantor in the vicinity of the cameras themselves and at the entrance, or in the vicinity, of the video surveillance area;
- Complete information on video surveillance at the entrance to the premises;
- Provide an e-mail address where information can be requested: ita-privacy@gw-semi.com
- Disclose direct references to EU Regulation 2016/679.

2.4 Guarantees for data transfers

The personal data relating to the processing in question, for the purposes indicated in point 2.1 that pre-cede, will be communicated to:

- Judicial authorities and/or police forces;

The scope of dissemination of data will be strictly limited to the execution of the task conferred by us to the subjects mentioned above.

2.5 Management of risks to the rights and freedoms of data subjects

Having regard to art. 35, paragraph 7, letter c, with reference to art. 35, paragraph 1, the Data Controller "shall implement appropriate technical and organizational measures to ensure, and be able to demonstrate, that processing is carried out in accordance with this Regulation. Such measures shall be reviewed and updated as necessary." (art. 24, paragraph 1), involving area managers.

With reference to the risk assessment, the following is specified:

- the storage or processing of personal data is not envisaged.

It has been verified and certified that the cameras do not in any way film workstations except for the "white areas" where, for reasons of safety and security of personnel, constant monitoring is necessary and therefore do not entail any criticality in the light of the prohibition on monitoring the activities of workers (art. 4 Law 300 of 1970) since the rooms under video surveillance are only occasionally visited.

2.6 Involvement of Stakeholders

Having regard to Article 35, paragraph 2 and taking into account Article 35, paragraph 9, it is specified that an appropriate communication campaign will be carried out to inform the interested parties (employees, collaborators, visitors and customers).

Novara March 16, 2021

Signature

Ing. Sergio Chiarla

A handwritten signature in black ink, consisting of a vertical line on the right, a horizontal loop on the left, and several vertical strokes at the bottom.