



## **INFORMATION NOTICE ON THE PROCESSING OF DATA THROUGH VIDEO SURVEILLANCE**

**pursuant to Article 13 of Regulation 2016/679/EU (“GDPR”)**

Dear Sir/Madam,

The company Safilo Industrial S.r.l., as independent data controller (hereinafter, the “**Company**” or the “**Independent Controller**”), informs you that a video surveillance system operating 24 hours a day has been installed and is in operation at the premises of the Company indicated by appropriate signage (hereinafter, the “Premises”).

Below, we illustrate the methods by which the Company process personal data collected in connection with your access to the Premises.

### **1. Data Controller and Data Protection Officer**

The independent data controller is Safilo Industrial S.r.l., with registered offices in Padua, via Settima Strada no. 15, 35129.

A Data Protection Officer (“DPO”) has been appointed and can be contacted at the following email address: [dpo@safilo.com](mailto:dpo@safilo.com).

### **2. Purposes, Legal Bases of Processing, and Nature of Data Provision**

<b>PURPOSES</b>	<b>LEGAL BASES</b>	<b>NATURE OF DATA PROVISION</b>
<p>The processing of personal data collected through the video surveillance system is carried out for the purposes of (i) workplace and third-party safety and (ii) protection of the Company’ assets.</p> <p>In any case, the personal data processed will not be used to verify the diligence of employees and collaborators, nor for the adoption of disciplinary measures.</p>	<p>Legitimate interest of the Independent Controllers to ensure the safety of workers and third parties transiting the Premises, as well as to protect the company assets present in the Premises.</p>	<p>The provision of personal data is optional. However, if you refuse to provide personal data, the Company may deny you access to the Premises.</p>
<p>Protection of the Company’s rights in court;</p> <p>For this purpose, the Company are required to process your personal data, in accordance with the terms and conditions provided by law, where necessary to comply with legal obligations or to ensure the protection of the Company’ rights.</p>	<p>Legitimate interest of the Independent Controllers to protect and exercise their rights in court</p>	<p>The provision of your data refers to a legal obligation. For this reason, failure to provide your personal data may prevent the Company from complying with legal obligations or from lawfully establishing, exercising, and protecting their rights in court.</p>

### **3. Retention Period**

Data will be retained for 48 hours from collection, after which they will be automatically deleted, except where it is necessary to retain them for longer periods due to holidays or company closures or to comply with specific requests from the Judicial Authority.

Lastly, where necessary to comply with legal obligations or to establish, exercise, or defend the Company' rights, we may retain your personal data for the limitation period provided by applicable legal provisions or, in any case, for as long as necessary to exercise the Company' rights in court.

### **4. Categories of Recipients of Personal Data**

Your personal data will not be disclosed to third parties but may be communicated, in relation to the processing purposes described above, to the following subjects:

- those who may access the data by virtue of provisions of law under European Union or national law;
- subjects who carry out activities functional to the achievement of the purposes referred to in paragraph 2, such as external Companies responsible for the maintenance of the video surveillance system and providers of fiduciary services;
- Italian companies within the Safilo Group, which, through the entities referred to in the previous point and their designated staff, operate the video surveillance system.

In addition to the above categories of recipients, persons acting under the authority and within the organization of the Company, who are instructed and authorized to process data pursuant to Article 29 of the GDPR and Article 2-quaterdecies of Legislative Decree no. 196/2003 and subsequent amendments (so-called "Privacy Code"), may become aware of your personal data.

### **5. Transfer of Personal Data to Third Countries**

The Independent Controller does not transfer your personal data to countries outside the European Union.

### **6. Diritti degli interessati**

Regarding the processing of your personal data, you, as the data subject, have the right to obtain access to your personal data from the Company. You may also request the rectification or erasure of your data.

Furthermore, you have the right to obtain the restriction of processing of your personal data.

Lastly, you have the right to lodge a complaint with a supervisory authority or to take legal action if you believe that the processing concerning you violates the GDPR.

To exercise any of your rights, you may contact us by sending a communication to the Company' registered office or by sending an email to [dataprotection@safilo.com](mailto:dataprotection@safilo.com).

### **7. Changes**

This information notice was updated in May 2026.

Any updates to this information notice will be available at the reception of our premises and at <https://www.safilo.com/it/data-protection>.