



Audio-video Recordings\_Statement of privacy policy (GDPR) – Rev. 3 –27/04/2023

**Subject:** Information pursuant to Legislative Decree 196/03, including subsequent amendments and additions, and Article 13 of EU Regulation 2016/679 on the protection of personal data.

INNOVA S.p.A. states that, for the realisation of images, videos and multimedia materials to be used for internal training, demonstration and test of its own products, it is the owner of your data classified as personal data pursuant to the personal data protection Code (Legislative Decree 196/2003 as amended by Legislative Decree 101/2018) and to EU Regulation 679/2016 (GDPR).

### **Processing purposes**

The processing consists in the recording of videos and multimedia materials, in the relevant processing and conservation, and in the possible subsequent playback in the systems dedicated to the company education, and to the product demonstration or testing.

The collected personal data are related to the images and the audio-video recordings of the people participating in events, training courses, educational initiatives or demonstration of its own products and services organised by Innova S.p.A. company in person or via digital audio-visual communication tools.

The collection and processing of personal data are carried out:

- for the documentation of organized events;
- for the realisation of teaching and educational multimedia material for internal use;
- for the playback, even in part, within the educational multimedia platform for internal use;
- for the playback, even in part, within the software platforms to demonstrate and test products.

The data will be processed by Innova S.p.A. according to principles of fairness, legitimacy, transparency and safeguard of your privacy and rights.

### **Processing methods**

The data processing for the above purposes takes place with automated, electronic or magnetic means, in compliance with the rules of confidentiality and security provided by the law, the related regulation and internal policies.

Any use of images or audio-video recordings which may harm the honour, the reputation or the decorum of the depicted, filmed or recorded person is in any case excluded, pursuant to Article 97 of Law no. 633/1941 and Article 10 of the Italian Civil Code.

### **Processing place**

Data are currently processed and stored at the registered office in via del Follatoio 12, 34148 TRIESTE, on servers owned by Innova S.p.A. hosted in data centres located on Italian territory, as well as on host servers of business Microsoft 365 cloud platform, located in the territory of the European Union.

### **Mandatory or optional nature of data provision**

The provision of data is optional; the legal basis for the data processing is the consent by the participant to the events organized by Innova S.p.A.. Such consent is expressed by filling out the provided

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attendance form, including the authorization for audio-video recordings, or by filling out the authorization and consent to the processing of personal data form attached below.

## **Data communication**

Images and videos cannot be transferred out of Innova S.p.A. company.

While managing your data, the following subjects and/or internal managers – identified in written form and to whom specific written instructions have been given – may become aware of them:

- personnel responsible for the recording or the processing of videos and images;
- employees of the personnel department;
- employees of the training department;
- area managers;
- business administration.

## **Data Transfer abroad**

All processing of the personal data collected for the above purposes takes place within the European Union.

## **Personal data retention period**

The data provided will be stored in our archives for a maximum period of 5 years pursuant to Article 5(1)(e) and recital 39 of the GDPR.

## **Presence of automated decision-making processes**

None of the personal data collected for the above purposes will be used within automated processes, on which decisions having significant effects on physical persons depend.

## **Rights of the data subject**

For convenience we underline that, pursuant to current legislation on the protection of personal data, the data subject may exercise the following rights:

- Access to personal data;
- Correction, cancellation or limitation of the processing of personal data;
- Objection to the processing;
- Right to withdraw consent if the processing is based on consent;
- Submitting of a complaint with the Supervisory Authority (Privacy Guarantor).

With the exception of the right to submit a complaint with the Supervisory Authority, which shall be exercised by directly contacting the Authority, the data subject may exercise the other rights listed above by contacting the Data Controller at the registered office indicated below or via e-mail to: [privacy@innovatrieste.it](mailto:privacy@innovatrieste.it).

## **Data Controller and Manager**

The Data Controller, who can be contacted to assert the above rights, is Innova S.p.A. company, with



headquarters in via del Follatoio 12, 34148 TRIESTE.

**Data Protection Officer (DPO)**

Innova S.p.A. has designated the Data Protection Officer who you can freely contact for any clarification or problem regarding your privacy at the email address [privacy@innovatrieste.it](mailto:privacy@innovatrieste.it)

Innova S.p.A.

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FORM FOR AUTHORISATION AND PROVISION OF CONSENT TO PERSONAL DATA PROCESSING

I the undersigned \_\_\_\_\_ born in

\_\_\_\_\_ province (\_\_\_\_) on \_\_\_\_\_

DECLARE

- to have received and read the information about the processing related to video and multimedia material recordings, to their relevant processes and conservation, and to the possible subsequent playback within the systems used for training in, demonstrating or testing Innova S.p.A. products.
- to have nothing to claim and to irrevocably waive any right, action or claim resulting from the authorisation granted for the playback of videos and multimedia materials.

AUTHORISE

free of charge, without limitations of time, place or means, also pursuant to Articles 10 and 320 of the Civil Code and Articles 96 and 97 of Law 22.4.1941, no. 633 (Copyright law) the playback in any form of my own images and personal information to be found in the above video and multimedia material recordings.

Having been informed, pursuant to Article 13 of the Regulation (EU) 2016/679:

- of the identity of the Data Controller
- of the measure and the methods with which the processing takes place
- of the purposes to which the personal data are destined
- of the right to withdraw consent

AGREE

by signing this form, pursuant to Article 7 and ss. of the EU Regulation 2016/679 (GDPR), to the processing of personal data according to the provisions and within the limits envisaged in the statement "Audio-video Recordings\_Statement of privacy policy (GDPR) – Rev. 3", including those considered as special categories of data.

\_\_\_\_\_, \_\_\_\_\_

Legible signature

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