

## DOCUMENT ON VIDEO SURVEILLANCE at Fondazione Bruno Kessler

drafted pursuant to Legislative Decree no. 196/2003 and the Provisions of the Italian Authority for personal data protection of April 8, 2010

adopted with Resolution 01/2018 dated January 23, 2018 of the Head of the IT, Infrastructure and Corporate Assets Service in his position as Chief Officer for Video Surveillance

## Introduction

With this document, Fondazione Bruno Kessler (hereafter FBK), Data Controller, intends to conform with the Provision on Video Surveillance, issued by the Italian Authority for the protection of personal data with General Provision of April 8, 2010.

### 1. Purposes of data processing

Video surveillance systems have been installed at FBK as follows:

- A. Premises on via Sommarive 18, Povo (TN)
- B. Premises at Villa Tambosi - Strada delle Tabarelle 286, Villazzano (TN)
- C. Headquarters on via Santa Croce 77, Trento
- D. Premises on via alla Cascata 56/C, Povo (TN)
- E. Premises on vicolo Dallapiccola 12, Trento

The aims pursued are as follows:

- a. security
- b. protection of company property
- c. control of unauthorized access

### 2. Lawfulness of processing

The processing of data through video surveillance has the exclusive purposes listed in the previous paragraph. The processing will be carried out according to the principle of accuracy, and for specific (security, protection of company assets, control of unauthorized access) and legitimate (pursuant to Article 13 of Legislative Decree No. 196/2003 and Gen. Prov. dated April 8, 2010) purposes. These concepts are communicated to the interested parties by posting appropriate information. Furthermore, art. 4 of Act No. 300/1970 (Workers' Statute) has been expressly observed.

### 3. Purpose limitation

The Foundation undertakes to respect the principle of necessity of processing. Therefore, unnecessary uses are excluded and excessive redundancies are avoided.

The use of the video surveillance system is deemed necessary due to:

- the particular value of the equipment used;
- the value of the information processed and stored on the Foundation's premises;
- the number of Users accessing the Foundation's premises;
- the condition of isolation of the area surrounding the perimeter of the Foundation;
- the opening to the public of some of the Foundation's premises;
- the Foundation's character of potential "sensitive target";
- previous cases of vandalism in the premises and in the immediate vicinity of the Foundation and the risk of recurrence.

#### 4. Minimization of data processing

The data collected are those strictly necessary to achieve the purposes expressed in item No. 1.

#### 5. Systems

The system consists of cameras placed inside and outside of the buildings identified in the following plans:

- Premises on via Sommarive 18, Povo (TN)
  - a) BLD N: A00, A01, A02, A03, A04, A05
  - b) BLD O: A02, A03, A04
  - c) BLD E: A04, A05
- Premises on via alla Cascata 56/C: A00, A02, A03
- Premises at Villa Tambosi - Strada delle Tabarelle 286, Villazzano (TN)
  - a) BLD VT: A00, A01, A02
  - b) BLD RT: A02
- Headquarters on via Santa Croce 77, Trento: A00, A02, A03
- Premises on vicolo Dallapiccola 12, Trento

All information about the system is detailed in the document "FBK.xlsx Plant Network".

All the documents mentioned above are constantly updated and kept by the IT, Infrastructure and Corporate Assets Service.

The plans contain the following legend:

LEGENDA SIMBOLI	
Simbolo	Descrizione
	Telecamera DOME NVR Milestone
	Telecamera Fissa NVR Milestone
	Telecamera Fissa NVR March Networks
	Telecamera DOME DVR Sistore
	Telecamera Fissa DVR Sistore
	Telecamera Fissa DVR Wavlet

Based on the legend, the type of camera and the video recorder on which the image is screened and recorded can be identified in the above plans.

**A) The system consists of video cameras and video recorders such as:**

- 1) Fixed and Dome digital cameras, associated with an NVR video recorder (see Milestone) located in the West building server room.  
  
The images recorded can be viewed with a software requiring authentication (Username and Password).  
  
Image retention has been set to 72 hours.
- 2) Fixed digital cameras, associated with an NVR video recorder (see March Networks) located in the West building server room.  
  
The images recorded can be viewed with a software requiring authentication (Username and Password).  
  
Image retention has been set to 72 hours.
- 3) Fixed and dome analog cameras, installed in the garage of the North Building, associated with a DVR video recorder (see Siemens-Sistore) located in the North Building's reception.  
  
The images recorded can be viewed with a software requiring authentication (Username and Password).  
  
Images are retained based on the availability of videorecorder disk space and the amount of stored images.
- 4) Fixed analog cameras, installed along the external perimeter area of the buildings of the Povo premises, associated with a video recorder (Wavlet) located in the main gatehouse of the Povo site (Guardiola).  
  
The images recorded can be viewed with a software requiring authentication (Username and Password).  
  
Images are retained based on the availability of videorecorder disk space and the amount of stored images.

"Dome" type cameras are controlled by the designated officers only from the Povo porter's lodge through keyboards and joysticks.

***B) The images captured by the system are screened live through monitors positioned in the following reception areas:***

- 1) Povo Site (Guardiola):
  - All the images of the Povo Site (EAST-NORTH-WEST Buildings)
  - All the images of the Trento Headquarters - via Santa Croce
  - All the images of the Trento premises - Vicolo Dallapiccola
  - All the images of the Villazzano premises
  - All the images of the Via alla Cascata premises
- 2) Trento premises:
  - Images of the Trento premises only
- 3) Villazzano premises:
  - All the images of the Villazzano premises

4) Via alla Cascata buildings:

- Only the images of the Via alla Cascata premises

The monitors are positioned in such a way that they cannot be viewed by third parties.

## 6. Notification signs

Pursuant to Provision of the Italian Privacy Authority of April 8, 2010, appropriate signs are posted at the sites of recording.

The information pursuant to art. 13 of Legislative Decree n.196/2003) is posted:

- by the recording locations or in the immediate vicinity of the cameras;
- the signs have a format and are placed in such a way that they are clearly visible before accessing the area under video surveillance.

## 7. Appointment of designated officers

The Video Surveillance Chief Officer, appointed by the Board of Directors at the meeting of December 20, 2017, is Mr. Marco De Rosa. Pursuant to art. 30 of Legislative Decree No. 196/2003, he will appoint in writing the designated officers for the processing who will have access to monitors or run the system, after having received appropriate instructions.

## 8. Data use

The data collected will be used for security and access control reasons in the forms and within the limits established by current regulations.

## 9. MONITORING

Periodic checks on compliance with current regulations and with instructions given to the appointed officers, will be carried out

## 10. Updates

This document is subject to periodic review. All future changes to this document will be communicated to the Users and posted to the FBK website.

Trento, January 23, 2018

The Chief Officer for Video Surveillance

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