

1. PURPOSES OF PROCESSING

The purpose of the processing is exclusively the prevention of the spread of COVID-19 infection and, therefore, the protection of the health and safety of all workers within the FBK premises.

2. LEGAL BASIS FOR THE PROCESSING AND OBLIGATION TO PROVIDE DATA

The legal basis for the processing is the need to fulfill the legal obligations regarding labor and social security regulations to which FBK is subject, namely the implementation of the anti-contagion safety protocols pursuant to art. 1, c. 7, lett. d) of the Decree of the Prime Minister of March, 11 2020 and of the operational guidelines of the "Shared protocol for the regulation of measures to combat and contain the spread of Covid-19 in the workplace" of March 14, 2020, as well as pursuant to the provisions set forth in the ordinance of the President of the Autonomous Province of Trento of April 13, 2020 entitled "further measures for the prevention and management of the COVID-2019 epidemic crisis"; finally, since October 15, 2021, also pursuant to Decree No. 127/2021 in order to verify the possession of the Green Pass.

Showing the Green Pass, producing the required statement and allowing the measurement of the temperature in real time is necessary processing in order to have access to the premises, therefore your refusal will make it impossible for you to access or to remain at FBK premises.

3. TYPES OF DATA PROCESSED

The following categories of data may be processed:

- 1) personal details, contact details and Green Pass QR Code;
- data suitable for determining your health conditions, such as flu symptoms and body temperature (following measurement, where performed) and the presence of the virus (following a rapid swab, where performed);
- 3) Green Pass verification result.

4. PROCESSING METHOD

Access to FBK premises will be granted to workers in possession of a valid Green Pass, to workers who do not exhibit or have had no contact with people who have flu-like symptoms such as cough, fever above 37.5 degrees, conjunctivitis, muscle pain.

FBK therefore requires **anyone accessing its premises** to show a valid Green Pass and to produce a statement certifying the absence of flu-like symptoms and no contact with people who have exhibited symptoms in the previous 24 hours.

Also, FBK plans to carry out body temperature spot checks on people who have accessed its premises.

Data shall be processed as follows:

- manually as well as through automated systems;
- by individuals authorized and trained to perform these duties, in accordance with the law;
- using appropriate measures to ensure the confidentiality of personal data and avoid access by unauthorized third parties;
- in contexts that do not affect the dignity and propriety of the person concerned.

Validity will be verified by scanning the QR code that appears in the Green Pass with the Verifica C-19 application. The Covid-19 certificate, either digital or printed, shall be exhibited to the staff in charge of the verification.

POLICY ON PERSONAL DATA PROCESSING IN RELATION TO THE COVID-19 EMERGENCY

Identification data and failed Green Pass verification (no Green Pass or an invalid one) will be recorded to document the reasons that prevented access to the FBK premises.

No automated decision-making process nor profiling activity is expected.

5. DURATION OF DATA RETENTION

FBK shall not store the personal data obtained after the real-time measurement of your body temperature. FBK shall only record that the max temperature has been exceeded only if it is necessary to document the reasons that prevented access to the Foundation's premises.

Any personal data collected as per this information document will be stored by FBK until the end of the state of emergency caused by the COVID-19 outbreak has been decreed by national or local authorities, and, in any case, for a period not exceeding that necessary to fulfill the obligations referred to in point 2, and subsequently deleted.

Data may be retained for a longer period upon requests from the public authorities.

6. DATA DISCLOSURE

No personal data collected by FBK will be disclosed or shared with third parties outside the specific regulatory provisions (e.g. in the event of a request from the Health Authority for the reconstruction of any close contacts of workers who have tested positive for COVID- 19).

7. PLACE OF DATA PROCESSING

Personal data will be processed only at FBK premises in Italy. No personal data collected pursuant to this informed consent document will be transferred to third countries.

8. DATA SUBJECT RIGHTS

We inform you that, pursuant to Chapter III of the GDPR, you can exercise the following rights at any time:

- request access to your personal data and obtain a copy thereof;
- if you consider them to be inaccurate or incomplete, request amendment or integration, respectively;
- if the legal conditions exist, refuse the processing of your data, request their cancellation (within the constraints of the provisions under art.17, paragraph 3, letter d of the Regulation for data necessary for scientific research purposes) or exercise the right to limitation;
- ask for the portability of your data to another subject in a format that facilitates its consultation and use;
- submit a complaint to the Supervisory Authority (Privacy Authority).

For information about the protection of personal data, including the exercise of the aforementioned rights, you can contact the FBK Safety and Prevention Unit at the following e-mail address: <u>sicurezza@fbk.eu</u>.

9. DATA CONTROLLER AND CONTACT INFORMATION FOR THE DPO

The Data Controller for the personal data of the individuals who access its offices is Fondazione Bruno Kessler (FBK), with registered office in Trento, via Santa Croce, 77 - <u>segr.presidenza@fbk.eu</u> - ph. +39.0461.314.621.

The Data Protection Officer - DPO designated by FBK can be contacted through the following channels: <u>privacy@fbk.eu</u> - ph. +39.0461.314.370.