

## DOCUMENT ON VIDEO SURVEILLANCE at FONDAZIONE BRUNO KESSLER

drawn up pursuant to EU Regulation no. 679/2016, to the Provision of the Personal Data Protection Authority of April 8, 2010 and to Guidelines 3/2019 of the European Committee for Data Protection

adopted with resolution no. 01/2018 of January 23, 2018 of the Head of the IT, Infrastructures and Corporate Assets Service in his capacity as Head of the Video Surveillance System

updated with Resolutions No. 02/2022 of January, 31 2022 of the Head of the Corporate Assets Service in his capacity as Head of the Video Surveillance System

## Introduction

With this Document, Fondazione Bruno Kessler (hereinafter FBK), **Data Controller**, intends to provide detailed information regarding the processing of personal data consisting of images from the video surveillance system installed at the Foundation's offices.

This Document is published on the Foundation's website and displayed at all facility entrances.

Special signs containing appropriate and brief information aimed at setting out the general provisions for the processing involved are placed in the locations where the recording occurs or near the cameras and their size and location allow for them to be clearly visible before entering the monitored area.

The **Data Protection Officer (DPO)** designated by the Data Controller pursuant to Article 37 of the GDPR can be contacted through the following channels: +39.0461.314.370 - [privacy@fbk.eu](mailto:privacy@fbk.eu).

### 1. Place of data processing.

The video surveillance systems are installed at FBK premises:

- A. Operational premises in via Sommarive 18, Povo (TN)
- B. Operational premises at Villa Tambosi - Strada delle Tabarelle 286, Villazzano (TN)
- C. Registered office in via Santa Croce 77, Trento (TN)
- D. Operational premises in via alla Cascata 56/C, Povo (TN)
- E. Offices in vicolo Dallapiccola 12, Trento (TN)

### 2. Purpose of data processing.

The processing of the data captured has the following purposes:

- a. safety and security from illegal and fraudulent behavior of natural persons who attend the Foundation's offices;
- b. protection from theft and vandalism of both corporate and third party assets;
- c. unauthorized access control.

### 3. Legal basis for data processing.

The processing of personal data is conducted in compliance with art. 4 of Law no. 300/1970 (Workers' Statute) and having a specific trade union agreement for the installation of the video surveillance system been signed.

The legal basis of data processing is the legitimate interest of the Data Controller to use a video surveillance system for the protection and safety of the areas and persons within its competence.

Please note that providing the data is a required condition to access the Foundation's offices. Pursuant to the Provision of the Data Protection Authority on video surveillance of April 8, 2010, the consent of the data subjects is not required for the pursuit of the purposes of protecting the Foundation's property and the protection and safety of persons.

The Foundation undertakes to respect the principle of purpose limitation of processed data: therefore unnecessary uses are excluded and redundancies avoided. It is deemed necessary to use the video surveillance system because of:

- the high value of the equipment present in the Foundation's premises;
- the value of the information processed and stored on the Foundation's premises;
- the number of Users who access the Foundation's premises;
- the condition of isolation of the area surrounding the perimeter of some of the Foundation's locations;
- some premises of the Foundation being open to the public;
- the potential nature of the Foundation as a "sensitive target";
- previous cases of vandalism in the premises and in the immediate vicinity of the Foundation and the risk of recurrence.

The data collected are those strictly necessary to achieve the purposes set out in point 1 and those in support of civil trial proceedings to protect people and property from possible aggression, theft, robbery, damage and vandalism.

#### 4. Processing methods and data storage period

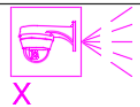



The video surveillance system consists of cameras outside and inside the buildings identified in the following plans:

- Operational premises in via Sommarive 18, Povo:
  - a) GENERAL POVO: A00
  - b) BLD N: A01, A02, A03, A04, A05, A06
  - c) BLD O: A02, A03, A04, A05, A06
  - d) BLD E: A03, A04, A05, A06
- Operational premises in via alla Cascata 56/C: A00, A01, A02, A03, A04, A05, A06, A07
- Operational premises at Villa Tambosi - Strada delle Tabarelle 286, Villazzano:
  - a) GENERAL VILLAZZANO: A00
  - b) BLD VT: A01, A02, A03, A04
  - c) BLD RT: A00
- Main offices in via Santa Croce 77, Trento: A00, A01, A02, A03, A04
- Operational offices in vicolo Dallapiccola 12, Trento: A01

All information relating to the system is detailed in the document "Rete Impianti FBK.xlsx".

All the above documents are constantly updated and stored by the Corporate Assets Service in the shared folder "Patrimonio CAD".

The building plans include the following legend:

LEGENDA IMPIANTI ELETTRICI - TVCC	
SIMBOLO	DENOMINAZIONE
	Telecamera DOME PTZ
	Telecamera Fissa - Accessi Interni
	Telecamera Fissa - Perimetrali
	Postazione fissa Client visualizzazione immagini

Based on the legend, the type of camera installed can be identified in the above plans.

**A) The system consists of different types of cameras and a single video recorder:**

- Fixed and Dome digital cameras, associated with an NVR video recorder (see Milestone) located in the West building server room at the Povo Hub.
- The images recorded can be viewed with a software requiring authentication (Username and Password).
- The images are recorded H24 with Motion Detection function.
- Image retention has been set to a maximum of 120 hours.
- 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 Hub (Guardiola):
  - All the images of the Povo Hub (EAST-NORTH-WEST building)
  - All the images of the Trento offices - via Santa Croce
  - All the images of the Trento offices - Vicolo Dallapiccola
  - All the images of the Villazzano offices
  - All the images of the Via alla Cascata offices
- 2) Trento offices:
  - Images of the Trento offices only
- 3) Villazzano offices:
  - All the images of the Villazzano offices
- 4) Palazzine alla Cascata:
  - Images of via alla Cascata offices only

The monitors are positioned in such a way that they are not visible to third parties.

Data is processed on European Union territory by subjects authorized to carry out these tasks, in accordance with the law, through the use of manual and automated systems, with logic designed to ensure data confidentiality, integrity and availability.

The Video Surveillance System Manager, appointed by the Board of Directors, designates the Authorized Data Processors who have access to the monitors or system management, providing them with appropriate guidance.

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

Considering the relevant security needs, images are stored for a maximum period of 120 hours, except for images taken during the weekends or on holidays or closures. The images will be automatically deleted after this period, unless otherwise ordered by the judicial police.

## 5. Data communication

Without prejudice to communications following legal and contractual obligations, the personal data collected and processed may be shared with the competent authorities who may request them for the purposes of prevention, investigation, detection and prosecution of crimes, or execution of criminal sanctions, including safeguarding and preventing threats to public safety.

Personal data is not subject to disclosure.

## 6. Data Subject's Rights

The Data Subject has the right to contact the Data Controller at any time to exercise the rights referred to in Articles 15 et seq. of the GDPR and in particular:

- request confirmation as to whether or not one's personal data are available;
- obtain information on the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data has been or will be communicated and, where possible, the storage period;
- request rectification and deletion of personal data;
- obtain the limitation of the processing;
- refuse the processing at any time.

To exercise the aforementioned rights, it is possible to contact the Video Surveillance System Manager at [videosorveglianza@fbk.eu](mailto:videosorveglianza@fbk.eu).

The right to lodge a complaint with the Data Protection Authority remains unaffected.

## 7. Inspections

The Data Controller carries out periodic checks on compliance with the regulations in force and on the verification of compliance with the instructions given on the part of the authorized parties.

## 8. Updates

This Document is subject to periodic review. All future changes to this Document will be duly communicated to Users and made public on the FBK website.