



PROCESSING OF DATA FROM ON-BOARD VIDEO SURVEILLANCE OF VEHICLES

DISCLOSURE REGARDING THE PROCESSING OF PERSONAL DATA

provided pursuant to arts. 13 and 14 of EU Regulation no. 2016/679

Dear Customer,

We would like to inform you that EU Regulation no. 2016/679 and Italian Legislative Decree no. 196 of 30/06/2003, also known as the "Personal Data Protection Code", provide for the protection of persons and other parties with regard to the processing of personal data. In particular Start Romagna S.p.A. is required to provide you with certain information regarding the use of your personal data.

The processing of the data will be based on the principles of lawfulness, fairness, and transparency and the protection of your confidentiality and rights.

DATA CONTROLLER

The "Data Controller" is Start Romagna S.p.A. with registered office at Viale C. A. Dalla Chiesa 38, Rimini.

DPO - Data Protection Officer

Start Romagna S.p.A. has appointed a Data Protection Officer (DPO) who can be contacted at the following e-mail address: dpo@startromagna.it

TYPE OF DATA

In compliance with the privacy regulations in force and according to the guidelines provided by the Italian Data Protection Authority (Provision on video surveillance of the Italian Data Protection Authority of 8 April 2010, hereinafter also referred to as Provision of 08/04/2010) and the European Data Protection Committee (Guidelines 3/2019 on the processing of personal data by means of video devices of 29 January 2020), START ROMAGNA S.P.A. has installed on its vehicles suitable video surveillance systems with closed-circuit cameras. Only in the event of actual necessity (e.g. in the event of an emergency situation or objective

danger for the safety of passengers or personnel on board), vehicle drivers may use a dedicated device (known as a "Panic Button") to activate a special operating mode that allows the transmission (in real time) of on-board camera footage to the relevant operations room and to Law Enforcement Agencies, in order to allow an immediate reaction by them to manage the event.

PURPOSES AND METHODS OF PROCESSING

PURPOSES OF PROCESSING: These systems are installed and used for the following purposes:

- a) Protection of company assets and vandalism, theft, or damage on vehicles;
- b) Protection of the safety of passengers and staff on duty on means of transport;
- c) Handling of any claims for compensation due to personal injury.

PROCESSING METHODS: processing is carried out with electronic and automated means. The data collected (video recordings without audio recording) will be adequate for the purposes set out above, processed in a manner that is relevant to those purposes, and limited to those purposes. All data are processed in electronic form and measures are implemented to minimise processing, as regards the type of data, access authorisations, and retention times. Specific security measures are taken to prevent data loss, unlawful or incorrect use, and unauthorised access.

DATA ACCESSIBILITY

Within the Data Controller's organisation, video recordings can be accessed by the employees of the IT Department and Management, as well as by the service managers of the three areas (Forli-Cesena, Ravenna, and Rimini). They are authorised to process the data and have been adequately trained.

If the recordings are authorised for the purpose of investigating criminal offences, the recordings may be provided, upon request, to the judicial authorities or to law enforcement agencies to the extent of their responsibility. In this case, these authorities will process the data as independent Data Controllers.

If the Panic Button system is activated, the employees on duty in the relevant operations room and the designated officers of the Law Enforcement Agencies shall have access to view (in real time) the footage from the video cameras.

Under no circumstances may the recordings be disseminated.

LEGAL BASIS AND LAWFULNESS OF THE PROCESSING

Your personal data (video footage), collected using the video surveillance systems, will only be processed on the legal basis of the legitimate interest of the Data Controller, pursuant to Article 6(1)(e) and (f) of Regulation (EU) 2016/679.

RETENTION

The records are retained for 7 days. After this period has passed, they are automatically deleted. An exception is made for recordings for which, for the purpose of investigating a crime, a longer retention period is required, after a specific report has been filed with the judicial authorities. In this case, the recordings may be retained for the duration of the investigation or any judicial proceedings.

RIGHTS OF THE DATA SUBJECT

You may contact the Data Controller in order to exercise your rights as provided for in Articles 15 to 22 of EU Regulation 2016/679 and which are set out below:

- the right to ask the data controller for access to your personal data (Art. 15);
- the right to ask the data controller for the erasure of your personal data (Art. 17);
- the right to ask the data controller to restrict the processing of your personal data (Art. 18);
- the right to object to the processing of your personal data (Art. 21);

You also have the right to lodge a complaint with a supervisory authority (Italian Data Protection Authority). You can exercise this right by going to the Authority's website (www.garanteprivacy.it).

AUTOMATED DECISION-MAKING PROCESS

Video recordings may never be subject to any automated decision-making process.

Rimini, 22 February 2021

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