

NOTICE PURSUANT TO ARTICLE 13 OF EU REGULATION 2016/679 ABOUT THE VIDEO SURVEILLANCE SYSTEM

HHLA PLT ITALY Ltd., with registered office in Trieste (TS) in via degli Alti Forni snc, in its capacity as Data Controller, informs you that we have received authorisation from the National Labour Inspectorate to use the video surveillance system.

To this end, we inform you pursuant to and for the purposes of Art. 13 EU Regulation 2016/679 that this authorisation has also been issued for security reasons as well as due to an obligation imposed by the harbourmaster's office there is video surveillance equipment.

Systems and equipment will not film places reserved exclusively for employees.

Personal data will be processed in compliance with fundamental rights and freedoms as well as the provisions of EU Regulation 2016/679 in terms of proportionality and limitation of processing.

In compliance with the provisions of the law, we inform you about the purposes and methods of the recorded images. In particular:

- **Purpose:** data collected through video surveillance systems subject to processing are processed and used directly for reasons of security and monitoring the integrity of the company's assets as well as for reasons of safety at work. The data are also collected for purposes of investigation by the judicial police when they receive a report of a crime committed in the port area under the jurisdiction of HHLA PLT ITALY Ltd.;
- **Method and duration of storage:** data processing is carried out by means of computerised procedures and any visualisation is only carried out by specifically authorised and formally instructed employees. The confidentiality of the images thus acquired is therefore guaranteed. The data will be kept for a maximum of 7 days, as authorised by the National Labour Inspectorate, with subsequent automatic deletion;
- **Disclosure to third parties:** the data will not be disclosed to third parties except to the judicial authorities, given that the processing is also carried out for the prevention of criminal offences as well as any subsequent investigation by the judicial police;
- **The legal basis for the processing** consists in the performance of an obligation imposed by the port authority as well as in the legitimate interest of the data controller in safeguarding the company's assets and in safeguarding vital interests, since the facility was also affixed for reasons of safety in the workplace;
- **Rights of the data subject:** we remind you that Art. 15 et seq. of EU Regulation 2016/679 establish the rights of the data subject (access, rectification, erasure or restriction of processing or objection to processing – if the latter three are realised, the legal basis for processing will no longer exist, preventing the Data Controller from performing an obligation imposed by the Port Authority). Finally, you have the right to appeal to the Data Controller or the Supervisory Authority.

Requests should be addressed to:

- by mail: privacy@hhl-plt.it
- or, in the second instance, to the Data Protection Authority, whose head office is in Rome, Piazza di Montecitorio n. 121, pc 00186.

HHLA PLT ITALY s.r.l.

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Administrative Offices: Viale Miramare 5, 34135 Trieste, Italy **Telephone:** +39 040 4193111 **Fax:** +39 040 44263 **Tax Code / VAT Number e Trieste Regional Business Registration n.:** IT01267080321 **Capital Stock:** EUR 24.011.000,00 i.v.

Company subject to management and coordination by HHLA International GmbH