INFORMATION ON THE PROCESSING OF PERSONAL DATA pursuant to Article 13 of the European General Data Protection Regulation *2016/679 VIDEO SURVEILLANCE INFORMATION*

The purpose of this document is to inform you about the lawfulness and purposes of the processing of the personal data you provide and that the processing operations will take place in full compliance with the principles of fairness and transparency as well as the protection of your privacy and your rights.

Therefore, in accordance with the provisions of European Regulation 2016/679 (hereinafter the "Regulation"), Legislative Decree no. 196 of 30 June 2003 as amended by Legislative Decree no. 101 of 10 August 2018 (hereinafter the "Privacy Code"). We provide you with the following precise and clear information on the processing of personal data, in accordance with the provisions of Art. 13 of the Regulation, point 3.1 of the guidelines of 8 April 2010 of the Data Protection Authority, of the Guidelines 3/2019 of the European Data Protection Board. We inform you that the Azienda Socio-Sanitaria Territoriale Bergamo Ovest,Piazzale Ospedale Luigi Meneguzzo 1 - 24047 Treviglio (BG), in its capacity as Data Controller, processes your personal data (Art. 13.1, lett. a) Reg. 679/2016).

Your personal data are processed in compliance with the principle of minimisation, pursuant to Article 5.1.c and 25.2 of Regulation 679/2016/EU, therefore lawfully, fairly and transparently; they are collected for specific, explicit and legitimate purposes; accurate and updated if necessary; relevant, complete and not excessive with respect to the purposes of the processing.

Local health and social care company, West Bergamo, guarantees that the processing of personal data is carried out in compliance with the fundamental rights and freedoms, as well as the dignity of the Data Subject, with particular reference to confidentiality, personal identity and the right to protection of personal data.

1. Data Controller

The Data Controller is the **Azienda Socio-Sanitaria Territoriale Bergamo Ovest (ASST BG Ovest)**, in Piazzale Ospedale Luigi Meneguzzo 1 - 24047 Treviglio (BG).

2. **Purpose and legal basis of the processing of Personal Data**

The personal data collected through the video surveillance system are processed by the Data Controller for the following purposes:

1. protection of the safety of people who access and work at the premises pertaining to the health facility, including workers, health workers, patients, users, visitors, suppliers and other authorized subjects;
2. protection of company assets and prevention, assessment and management of any unauthorized access, damage, theft, assault, vandalism or other illegal conduct;
3. possible protection of the rights of the Data Controller or third parties in administrative, judicial or extrajudicial proceedings

The legal basis provided for by the GDPR for the processing in question is:

1. **Art. 6 (1) (E)** where the processing is necessary for the performance of a task carried out in the public interest or in connection with the exercise of public powers vested in the Data Controller and/or, if applicable, **in Article 6(1)(f)** of the GDPR, for the pursuit of the Data Controller's legitimate interest in the safety of persons and the protection of assets.
2. Should special categories of personal data accidentally emerge from the images, the processing takes place within the limits of what is strictly necessary and in compliance with current legislation.

3. Categories of personal data processed

The categories of data processed include images collected through the video surveillance system installed in the areas of the data subjects.
Information relating to data subjects may be inferred from the images, including direct and indirect identification data and, in limited cases, information belonging to special categories of personal data, such as data suitable for revealing health status.
The system does not make audio recordings.

4. How we process your personal data

The processing is carried out by electronic means, through the collection and recording of images by the video surveillance system, with strictly relevant methods and not exceeding the purposes indicated above.

The cameras, positioned inside and outside the hospital's Emergency Room (*triage area*),are oriented in such a way as to limit the framing to the areas of interest, avoiding, as far as possible, the filming of areas unrelated to the declared purposes. All areas subject to video surveillance are appropriately marked by means of special information signs.
The data collected is processed exclusively by specifically authorized and trained personnel and by external parties appointed as Data Processors pursuant to Article 28 of the GDPR.
There is no automated decision-making or profiling activities starting from registrations.

5. Nature of the collection and consequences of failure to provide personal data

The processing of personal data by means of video surveillance is connected to the transit and access of the data subjects in the areas subject to filming.
By avoiding access to the video surveillance areas, the interested party may avoid the processing of their personal data, it being understood that, where these areas coincide with accesses, gates or premises for the provision of services, for organisational or security reasons, any lack of access may make it impossible to use the relevant services or to access the premises concerned.

6. **Subjects to whom personal data are communicated**

The personal data of the Data Subject may be communicated:

- to subjects whose right to access the data is recognized by provisions of law, secondary legislation, community legislation, as well as collective bargaining (e.g.: Police and/or judicial authorities, in the case of a reasoned request).
- to subjects to whom the communication of personal data is necessary or in any case functional to the fulfilment of the purposes indicated above (e.g.: supplier of the video surveillance system and other subjects who will be specifically appointed and instructed), to other subjects expressly authorized to process, within the limits of their respective competences.
- Personal data is not disseminated.

7. **Data Protection Officer (DPO) / Data Protection Officer (DPO)**

The DPO identified by the entity can be contacted at the e-mail address: dpo@gmsrl.it
In the case of requests/communications to be sent digitally, the DPO can also be contacted using the institutional contact details (PEC: protocollo@pec.asst-bgovest.it – PEO: ufficio_protocollo@asst-bgovest.it) and also by registered mail with return receipt Piazzale Ospedale Luigi Meneguzzo, 1 - 24047 Treviglio (BG) for the attention of the DPO.

8. Transfers of personal data outside the European Union

Your personal data will not be transferred outside the European Union.

9. Criteria used to determine the retention period

The Azienda Socio-Sanitaria Territoriale Bergamo Ovest declares that the recording of the images is kept for a period of 72 hours, at the end of which the images are automatically deleted by overwriting.

10. **Rights of the data subject**

We inform you that, at any time, the Data Subject may exercise:

- the right to ask the Data Controller, pursuant to Article 15 of EU Reg. 679/2016, to be able to access their personal data;
- the right to ask the Data Controller, pursuant to Article 17 of EU Reg. 679/2016, to be able to delete their personal data, where the latter does not conflict with the current legislation on the storage of the data and with the need to protect the professionals who have processed them in the event of legal disputes;
- right to object to the processing, pursuant to Article 21 of EU Reg. 679/2016 where the latter does not conflict with the current legislation on the storage of the data themselves and with the need to protect the professionals who have processed them in the event of legal disputes.

The Data Subject may exercise the above rights by making an informal request to the Data Controller, who will provide timely feedback. Your request may also be delivered to the Data Controller by ordinary mail, registered mail with return receipt Piazzale Ospedale Luigi Meneguzzo, 1 - 24047 Treviglio (BG) or e-mail to the following addresses: protocollo@pec.asst-bgovest.it – ufficio_protocollo@asst-bgovest.it.

11. **Right to lodge a complaint**

The Data Subject always has the right to lodge a complaint with the Data Protection Authority for the exercise of his rights or for any other matter relating to the processing of his or her personal data.

12. Changes

The Data Controller reserves the right to update this policy, also in view of future changes to the legislation on the protection of personal data.