

## **Video surveillance**

### **Personal Data Protection Policy**

(Pursuant to Art. 13 of European Regulation No. 679/2016)

Trenitalia S.p.A. invites you to carefully read the policy regarding personal data protection in relation to the images acquired through the video surveillance systems installed on board trains, on permanently installed equipment and on self-service machines.



### **I. Data Controller and DPO**

*In this section, we indicate our contact persons*

- The **Data Controller** is Trenitalia S.p.A., with registered office in Piazza della Croce Rossa 1, Rome, Italy, represented by the pro-tempore Chief Executive Officer, and can be contacted at: [titolaretrattamento@trenitalia.it](mailto:titolaretrattamento@trenitalia.it).
- The **Data Protection Officer** can be contacted at the following email address: [protezionedati@trenitalia.it](mailto:protezionedati@trenitalia.it).



### **II. Types of personal data**

*In this section, we indicate the types of data we process*

- Multimedia data acquired: videos captured by the cameras installed on board trains, on permanently installed equipment and on self-service machines.

The above data will be processed using electronic tools in order to guarantee suitable measures of security and privacy.



### **III. Purpose of Data Processing**

*In this section, we indicate why we process your data*

Protection of personnel and of company assets, and for organisational and/or production needs (e.g. to count the number of people). Provision of data (Mandatory); Legal basis (Legitimate interest)

The provision of the data necessary to pursue the purposes referred to above is “mandatory” in nature. The recordings are made by the Data Controller with the intention of pursuing its legitimate interests by gathering evidence allowing it to protect its personnel and company assets, including from potential attacks, theft, robbery, damages and vandalism; or for the purpose of preventing fires and ensuring work safety.



### **IV. Data recipients**

*In this section, we indicate who will process your data and to whom your data will be communicated*

In order to pursue the aforementioned purposes, your personal data will be processed by the following parties:

Parties attributable to Trenitalia S.p.A.:

- Trenitalia employees authorised for processing
- IT Services companies
- Video surveillance systems management companies

- Other companies from the FS Italiane Group

Parties not directly attributable to Trenitalia S.p.A.:

- Judicial authorities
- Law enforcement authorities
- Insurance services companies

Only parties expressly authorised by Trenitalia S.p.A. shall be permitted to view the live and recorded images in full. The images may also be accessed by companies acting as Data Processors on behalf of Trenitalia S.p.A., which have signed specific contracts that duly regulate the processing entrusted to them and their obligations regarding data protection. Your data will never be disseminated. In cases where video surveillance systems can be identified by the specific brief notices on the signs installed next to them, the images can be viewed in real time by law enforcement authorities.

The up-to-date list of data recipients is available by contacting the **Data Protection Officer** at the following email address: [protezionedati@trenitalia.it](mailto:protezionedati@trenitalia.it).



## V. Dissemination of data

*In this section, we guarantee that your data will not be disseminated*

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Your personal data will never be published, displayed or made available/consultable to unspecified parties.



## VI. Data retention

*In this section, we indicate the length of time your data will be stored*

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The images recorded via the video surveillance systems shall be stored for a maximum period of 7 days from their capture, after which they shall be automatically deleted by means of overwriting them. This is without prejudice in all cases to the possibility of storing the images beyond said period in case of major events or in the event of a request related to an investigation from the Judicial Authorities or the law enforcement authorities.



## VII. Rights of the data subjects

*In this section, we indicate the rights we guarantee*

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EU Regulation 2016/679 (Articles 15 to 23) grants data subjects the option to exercise specific rights. In relation to the processing of your personal data, you have the right to ask Trenitalia S.p.A. for access to the data concerning you (given the nature of the data being processed, the exercise of this right must be balanced against protecting the privacy rights of third parties or of the Controller), or for the limitation or erasure of the data in the event of processing which violates the law. Given the intrinsic nature of the data collected, you may not seek to have them rectified and/or modified, as the images pertain to objectively recorded facts. Moreover, you may not exercise the right to portability or to object to processing, as the processing is not based on your consent or on a contract but on the legitimate interests of Trenitalia S.p.A. You may ask to exercise your rights in relation to Trenitalia S.p.A. at any time by contacting the **Data Protection Officer** at the email address: [protezionedati@trenitalia.it](mailto:protezionedati@trenitalia.it).