



PRIVACY POLICY VIDEO SURVEILLANCE EX ARTT 13 E 14 REG. UE 2016/679 (GDPR)		
DATA CONTROLLER		
Name	Vado Gateway S.p.A.	
C.F. or P.IVA.	06259850961	
Registered Office	Via Aurelia 75B Vado Ligure (SV)	
Email	bssupportservices@apmterminals.com	
CATEGORY OF DATA PROCESSED		
Common data	Images of the interested parties in real time and their recording.	
Particular Data	N/A	
PURPOSE	LEGAL BASIS	DATA RETENTION
Organizational and productive needs as well as the protection of the assets of the Owner for the safety of personnel and subjects who access the work areas	Fulfilment of a legal obligation ex art. 6 co. 1 lett. c)	Data will be retained for 168 hours from the day of access to the video-monitored areas
Protection of the rights and property of the Data Controller, including legal proceedings	Pursuit of the legitimate interest of the Data Controller (art. 6 co. 1 lit. f)	For the entire duration of the legal proceedings undertaken and any time provided for the protection of the rights of the Data Controller
PROVISION OF THE DATA		
The provision of personal data of the interested party is mandatory		
COMMUNICATION OF DATA		
AUTHORIZED	The data will be processed exclusively by authorised parties instructed by the Data Controller for the management of compliance with health and safety at work (including the Supervisory Body, RSPP, HR Office, Legal Office, Board of Directors ).	
DATA PROCESSORS	The data may be communicated to Subjects entrusted with the activities of supervision and control, legal advice, health services companies, archiving or other technical/ organizational services. The above mentioned entities operating on behalf of the Data Controller have been designated as Data Processors.	
AUTONOMOUS DATA CONTROLLERS	The data may be communicated to subjects entitled by law or measures of the Authorities (for example, Judicial Authority, Labor Physician, Trade Union Associations, Public Bodies in matters of employment, welfare, assistance, tax, accounting, hygiene and safety etc.)	
DATA TRANSFER		
Personal data will not be subject to dissemination but may be transferred abroad, including in countries outside the EEA, according to legislation		
AUTOMATED PROCESS		
Data will not be subject to fully automated decision-making		
RIGHTS OF DATA SUBJECTS		
The privacy legislation (artt. 15-23 Reg. EU 2016/679) guarantees the Data Subject, except in the case where such fulfillment proves impossible or involves the use of means manifestly disproportionate to the protected right, the right to <ul style="list-style-type: none"><li>- access, updating, rectification or integration of data, deletion, anonymisation or blocking of data processed in violation of the law,</li><li>- know the details of the Data Processors appointed and the subjects to whom they have been communicated,</li><li>- object for legitimate reasons to the processing of your data,</li><li>- obtain the indication of the origin of the data, the purposes and methods of processing, the logic applied in case of processing carried out with the aid of electronic tools.</li></ul>		



The confirmation may take up to 30 days of processing.

Without prejudice to any other administrative or judicial remedy, the Data Subject has the right to lodge a complaint with the Supervisory Authority for cases of retention of the Company's breach of the provisions of EU Regulation 2016/679.

In order to exercise your rights and/or for all questions related to the processing of your data, the Interested Party may send a communication:

- By email to [bssupportservices@apmterminals.com](mailto:bssupportservices@apmterminals.com)
- By registered letter to Vado Gateway S.p.a., Via Aurelia 75B Vado Ligure (SV) 17047