

Information on the processing of personal data carried out through video surveillance, number plate detection and video door entry systems pursuant to Article 13 of Regulation (EU) 2016/679 ("GDPR")

Within the premises of the company **Aeroporto Guglielmo Marconi di Bologna S.p.A.** (hereinafter referred to as "**AdB**" or "**Owner**"), as well as within the Passenger Terminal and near the access gates to the vehicle lanes in front, subject to traffic restrictions, and at the entrances to the Owner's airport car parks, video surveillance and number plate reading systems are in operation. Furthermore, the Owner has installed special video intercoms to manage crew access to the so-called "*airside*" areas of the airport. All these systems are appropriately signposted, prior to the relevant radius of action, by means of special signs bearing the notice "VIDEO SURVEILLANCE AREA", in accordance with the provisions of the Privacy Guarantor's Measure on video surveillance of 8 April 2010. Other video surveillance devices also exist in the areas for access to the AdB offices, duly indicated by signage. The sole purpose of these devices is to provide security and to protect the company's property.

Data Controller

Aeroporto Guglielmo Marconi di Bologna S.p.A.

Address: Via Triumvirato, n. 84, 40132 Bologna (BO).

E-mail address: info@bologna-airport.it.

Data Protection Officer (DPO)

E-mail address: dpo@bologna-airport.it.

Processed personal data

Video recordings and/or images taken by means of the video surveillance system installed by the Owner, relating to: (i) individuals/passengers accessing the Airport Terminal and/or AdB's offices; (ii) registration numbers of vehicles in transit and of those present in the airport car park bays; and, (iii) audio and video recordings by means of video intercoms installed by the Owner relating to crew members accessing the runways.

Purpose and legal basis of the processing and the data retention period

Purpose

The systems described above are installed for the following purposes:

- Public safety: to ensure the protection and safety of individuals;
- Protection of the company's property: to prevent theft, robbery, damage, attacks and acts of vandalism.

Legal basis

The legal bases that make the processing of data compliant with the law are:

- The need to comply with the legal obligation to which the Data Controller is subject in accordance with the ENAC (Ente Nazionale per l'Aviazione Civile [Italian Civil Aviation Authority]) National Safety Programme (pursuant to Art. 6, paragraph 1, c) of the GDPR);
- The legitimate interest of the Data Controller regarding the protection of the safety of individuals, and the protection of the company's property (pursuant to Art. 6, paragraph 1, f) of the GDPR).

Data retention period

The video surveillance images and audio/video recordings via video intercoms are retained for 7 days, starting from the moment the images and audios were captured. After this time, the images and audio recordings are subject to automatic deletion by means of an overwriting system. The foregoing is without prejudice to the particular needs for further retention caused, for example, by the occurrence of incidents of criminal relevance, or by specific requests for investigation by court authorities.

Vehicle number plate images are kept for a maximum period of 24 hours from the date of the relevant vehicle's departure from the parking area where the detection system in question is installed, for a maximum of 12 months. After this period has elapsed, the images will be automatically deleted.

Parties authorised to process data

Data may be processed by ADB staff and operators who have been appointed to achieve the above-mentioned purposes, who have been expressly authorised to process the data by the Data Controller, who have received appropriate operating instructions and who are subject to professional confidentiality.

Data recipients

Data may be communicated to entities operating as data controllers, such as supervisory and regulatory authorities and any public entity entitled to request the data, for example, Court Authorities and/or Authorities Responsible for Public Safety, including Law Enforcement Agencies stationed at the airport (Italian Airport Police, Italian Finance Police, Italian Military Police, etc.). In view of the above, it should be noted that the Data Controller has an integrated video surveillance system that can be accessed directly by Law Enforcement Agencies.

Data may also be processed on behalf of the Data Controller by entities that are designated as data processors in accordance with Art. 28 of the GDPR. Those entities include security companies in charge of providing surveillance of the gates of the airport site by viewing video surveillance images.

Transfer of data to countries outside the European Union and/or the European Economic Area

Data may not be transferred outside the European Union and/or the European Economic Area.

Rights of the data subject - complaints to the Supervisory Authorities

By contacting the Data Controller via e-mail at info@bologna-airport.it, or parcheggi@bologna-airport.it (only for number plate images), data subjects may submit a request to the Data Controller to exercise, within the limits provided for by law, the following rights:

- access to images and/or audio recordings concerning them (pursuant to Article 15 of the GDPR);
- Erasure of data (in accordance with Art. 17 of the GDPR);
- Objection to data processing (in accordance with Art. 21 of the GDPR).

Data subjects may also lodge a complaint with the competent Supervisory Authority, in accordance with Art. 77 of the GDPR, if they believe that the processing of their data is not compliant with the legislation in force. The rights to update, supplement or rectify, as set out in Article 16 GDPR, cannot be exercised in practice, given the intrinsic nature of the data processed (images and audio recorded in real time concerning an objective fact). The right to data portability under Article 20 GDPR cannot be exercised, as the processing is carried out in execution of a legitimate interest of the Data Controller, as well as for the purpose of fulfilling specific legal obligations to which the Data Controller is subject.

The person concerned may request to see the images in which he/she believes he/she was filmed and/or listen to the audio recordings by producing or attaching appropriate identification documents to the request. The response to a request for access to data will not include any data relating to third parties, unless decomposition of the data that was processed or the removal of certain elements makes the personal data relating to the data subject incomprehensible. Once the terms of retention indicated above have elapsed, it will be impossible to comply with a request for access to data.