Privacy Policy concerning videosurveillance and guest management pursuant to art. 13 of General Data Protection Regulation 2016/679 (GDPR)

This Privacy Policy is provided pursuant to art. 13 of General Data Protection Regulation 2016/679 (GDPR) in order to acknowledge which are the processing policies for your personal data collected through the video surveillance system and in application of the procedures for managing guests to allow access to the offices in Forlì – Via Piero Maroncelli n. 10 - 47121 Forlì (FC), at Palazzo Hercolani –, and the warehouses in Forlì – via Zampeschi n. 116/A - 47122 Forlì (FC) – , the two of Piacenza – via Francesco Maria Bazzani snc - 29122 Piacenza (PC) and the warehouse di Colleferro – Via Adriano Olivetti – 00034 Colleferro (RM) and the offices in Milan – via Marghera n. 28 – 2014 Milano (MI) – ("**Premises**").

Processing of your personal data is always based on principles of lawfullness, fairness, trasparency, purpose and storage limitation, data minimisation, accuracy, integrity and confidentiality.

Data Controller and Data Protection Officer

The Data Controller ("**Controller**") is Unieuro S.p:A. with registered office in Forlì, Via Piero Maroncelli n. 10 - 47121 Forlì (FC), at Palazzo Hercolani, represented by its legal representative pro tempore *pro tempore* ("**Unieuro**") is the controller of the processing of your personal data ("**Controller**").

You can contact the Data Protection Officer ("**DPO**") of Unieuro at the following email address: dpo@unieuro.com.

How we collect your personal data:

a. Videosurveillance

This Privacy Policy integrates the "simplified" privacy policy provided through the signs placed at the cameras.

We inform you that your personal data, collected trough the video surveillance system istalled at the Headquarters on the basis of an agreement with the company union or authorization of the Territorial Labor Inspectorate, will be processed by the Controller in the manner specified below.

The video surveillance system will operate 24 hours a day, seven days a week, including public holidays.

Your personal data, collected through the video surveillance system, are processed in paper form and with the help of electronic means, in compliance with the GDPR and provisions of the Italian Supervisory authority, including in particular the Video Surveillance Provision - April 8, 2010 ("**Provisions**"), including security and confidentiality profiles, according to the logic and procedures related to the purposes indicated below.

The way in which the video surveillance system produces video images is such as to limit the visual angle of the area actually to be protected, avoiding, as far as possible, the shooting of surrounding places and details that are not relevant.

b. Visitor management and use of the smart locker for the safekeeping of valuables and documents

In order to allow you to enter the Premises, Unieuro collects some of your personal identification data in accordance with the internal procedures adopted by the Controller for the management and identification of guests.

To enable you to use the lockers available at the Controller's premises, Unieuro may associate your visit with the locker access data recorded by the application that allows the opening of the lock of the assigned locker or in the visitor log.

Personal data collected

On the occasion of your access to the Headquarters, your personal data subject to processing will be those covered by the definition in accordance to art. 4(1) of the GDPR, including, for example, your first name, surname, company name, your identification document, any data on the assigned smart locker number and accesses to it; while its image is collected through the videosurveillance system ("**Personal Data**").

Purpose, legal basis and optional processing

Unieuro will process your Personal Data in order to protect the company's assets (securities and real estate) and the security of people working in the Headquarters, to prevent theft and damage, to ensure safety at the workplace, as well as to establish, exercise or defence of legal claims of the company or of third parties, whether in court proceedings or out-of-court procedure ("**Security**")

The legal basis for this purpose is the pursuit of the legitimate interest of Unieuro to the protection of its corporate assets, the security of people working at the Headquarters, and for reasons of security and accountability in case of commission of crimes pursuant to art. 6(1)(f) of the GDPR.

Unieuro may also process your Personal Data in order to enable you to use the smart locker. The processing for this purpose is in pursuit of Unieuro's legitimate interest in providing you with a safe and comfortable stay at the Controller's premises in accordance with Article 6(1)(f) of the Regulation.

The provision of your Personal Data to Unieuro for this purpose is not mandatory, but otherwise it will not be possible to allow access to the Office or areas where cameras are installed and/or use of the company lockers.

Recipients

Your Personal Data may be accessible by the following parties, exclusively for the purposes described and in compliance with the rules provided by the GDPR and the Provision:

1) personnel authorised to process personal data who have committed to confidentiality or who have an appropriate legal obligation of confidentiality (es. employees of Unieuro);
2) any suppliers engaged by the Company for the pursuit of the above-mentioned purposes, who may also act as independent data controllers;
3) subjects who typically act as data processors pursuant to art. 28 of the GDPR, such as the company responsible for managing the maintenance of the video surveillance system;
4) competent authorities (e.g. judicial and police authorities), when necessary for the exercise or defense of a right by the Controller in the context of judicial proceedings or upon formal request.

Tranfer of personal data

Your Personal Data, including your image, will not be transferred to third parties outside the European Union.

Personal data retention

a. Videosurveillance

The images acquired by the video surveillance system cameras are retained from 1 to 7 days and then automatically deleted, without prejudice to further retention in the event of investigative activities by the judicial authorities or police or at the request of a private citizen or his/her legal representative for the protection of his/her rights. In the latter cases of further preservation, the images will

be stored for three months to be made available only to law enforcement authorities that request them and then deleted. In addition, the images may also be retained for three months for the purpose of the exercise or defence of a right in court by the Data Controller or in the event of injuries suffered by employees and visitors to the premises.

b. Visitor management and use of the smart locker for the safekeeping of valuables and documents

Your identity document will be retained by Unieuro only for the duration of your stay at the premises and will be returned to you upon your departure. Additional personal data relating to you may be recorded or stored, such as the smart locker number and any access logs if you have requested to use it. This is done to protect the company's assets (both movable and immovable) and the safety of individuals present on the premises, to prevent theft and damage, to ensure workplace safety, as well as to establish, exercise, or defend a legal claim in judicial proceedings, to comply with legal obligations or requests from authorities, and to provide the locker use and management service you have requested

Rights of data subject

You have the right to access at any time the Personal Data concerning you, pursuant to art. 15-22 of the GDPR. In particular, you may request the rectification, erasure, restriction of the processing of the Personal Data in the cases provided by art. 18 of the GDPR, the withdrawal of consent, to obtain the portability of data concerning you in the cases provided for by art. 20 of the GDPR and to object the processing of your Personal Data pursuant to art. 21 of the GDPR, as well as lodge a complaint with the competent supervisory authority pursuant to Article 77 of GDPR (Italian Supervisory Authority).

With regard to the video surveillance system, it should be noted that the right to rectification and integration cannot be exercised in practice in view of the intrinsic nature of the data collected, as they are images collected in real time concerning an objective fact.
In addition, requests for access to images depicting identifiable third parties will not be granted where it is not technically feasible to obscure the images of any third parties captured.
You can exercise your rights by writing to Unieuro at the above addresses or by e-mail to the following address: privacy@unieuro.com

Entry into force

This notice, in its updated version n. 5, has entering into force since 21/06/2025.