



PRIVACY INFORMATION NOTICE VIDEO SURVEILLANCE SYSTEMS

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Updated on April 1, 2025



1. YOUR PRIVACY



The taking of images by **Fideuram – Intesa Sanpaolo Private Banking S.p.A.** may constitute processing of your personal data.

We recognise the value that is to be placed on personal data and are committed to its safekeeping and confidentiality, ensuring that data processing is carried out in accordance with the principles of lawfulness, fairness, transparency, adequacy and relevance as required by the GDPR (General Data Protection Regulation - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016).

2. WHAT IS DATA PROCESSING? WHO IS THE DATA CONTROLLER?



The GDPR defines "**personal data**" as "any information relating to an identified or identifiable natural person".

The image is considered personal data.

The GDPR also defines precisely what is meant by "**processing**", namely "any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction".

As "**Data Controller**", **Fideuram – Intesa Sanpaolo Private Banking**, acting in full compliance with the principles of fairness, lawfulness and transparency, determines the means and purposes of each of these "operations" involving, even potentially, your personal data: all this while guaranteeing your confidentiality and fully protecting your rights.

3. WHAT PERSONAL DATA DO WE PROCESS WITH VIDEO SURVEILLANCE?

We process images of you as they are contained in recordings made using the video surveillance system on the company's premises and in the immediate vicinity.

4. WHO WE COLLECT YOUR DATA FROM? HOW DO WE PROCESS YOUR DATA?

The images we process have the following origins:



Direct, as they are acquired following your transit in the Company spaces subject to video surveillance or in the immediate vicinity of the same.

Indirect, if we have collected them from third parties (such as, for example, from the parent company Intesa Sanpaolo), following the sharing of the real estate spaces where the images themselves were collected.

We process your images using computer, telematic and manual tools, based on logic strictly related to the purposes indicated in this document and in any case in compliance with the technical and organisational measures required by law, in order to guarantee a level of security appropriate to the risk.

5. FOR WHAT PURPOSES DO WE PROCESS YOUR DATA? – WHAT IS THE BASIS FOR OUR PROCESSING?


The processing of personal data is only lawful if its purpose is supported by a valid legal basis, i.e. one of those provided for in the GDPR.

Namely, we pursue legitimate interests that prove to be lawful, concrete and specific, after ensuring that this does not compromise your fundamental rights and freedoms.

For personal data processing activities carried out for the protection of persons and company assets, for security purposes, through the acquisition of images and videos as part of video surveillance systems, there is in fact a **legitimate interest** of the data controller (art. 6.1 letter f) of the GDPR) and therefore your consent is not required.



In summary:

THE LEGAL BASIS	OUR PURPOSE
<i>Legitimate interest</i> (Art. 6.1(f) of the GDPR)	 Protection of persons and company assets, for security purposes, through the acquisition of images.

6. WHO COULD RECEIVE THE DATA YOU PROVIDED?

As a rule, your images will not be disclosed. We may transfer them to other entities, both inside and outside the European Union, solely for the specific purposes set out in this notice, in accordance with the legal bases provided for in the GDPR.

Your images may be transmitted to the Companies of the Intesa Sanpaolo Group that share the facilities where the images were taken: in this case, the same Companies may use the images exclusively for the purposes indicated in this policy.

The following can also be recipients of your images:

- the public authorities and the persons to whom the transmission of images is due in fulfilment of regulatory obligations (such as judicial or police authorities);
- Companies and third parties of the Intesa Sanpaolo Group, which carry out security-related activities (e.g., security and video surveillance)

The list of third parties and Companies outside the Intesa Sanpaolo Group that are recipients of your images is constantly updated and is available asking the Data Protection Officer.

The entities referred to in the previous points process your personal data, depending on the specific activities, in their capacity as Data Processor or also as Data Controller or Joint Controllers.

7. HOW DO WE PROTECT YOUR DATA WHEN IT IS TRANSFERRED OUTSIDE THE EUROPEAN UNION OR TO INTERNATIONAL ORGANISATIONS?

We normally process your images within the European Union, but for technical or operational reasons, we may however transfer data to:

- countries outside the European Union or international organisations that have been found by the European Commission to provide an adequate level of protection;
- other countries, in which case we rely on one of the "adequate safeguards" or one of the specific derogations provided for in the GDPR.



8. HOW LONG DO WE KEEP YOUR DATA?



We keep your personal images for as long as it is strictly necessary to achieve the purposes for which they were collected and process them in accordance with the provisions of the specific regulations.

Generally, the retention period is **seven** days and starts from the date of acquisition of the images/videos. For particular sites, the period is extended to thirty days (art deposits), ninety days (vaults) and one year (security deposits) respectively.

Personal images may also be processed for a longer period if an interrupting and/or suspending event occurs justifying the extension of data retention. All personal images will be deleted once the retention period expires.








9. WHO IS THE "DATA PROTECTION OFFICER"? HOW CAN YOU CONTACT HIM/HER?



The "Data Protection Officer" (DPO) is a guarantee figure that we have appointed, as explicitly required by the GDPR. You can contact the DPO for all matters related to the processing of your personal data and to exercise your rights under the GDPR, by sending an email to: dpo@intesasampaolo.com or to the PEC address privacy@pec.intesasampaolo.com.

10. WHAT ARE YOUR RIGHTS?

Articles 15-22 and 77 of the GDPR recognize you the rights set out below, which you may exercise in accordance with the specific features of the processing operations described in this policy:

 <p>Opposition (art. 21 GDPR): The GDPR allows you to object to the processing of your personal data under the conditions set out in the legislation, for example, in the case of processing carried out to pursue our or a third party's legitimate interest. In such cases, the processing will no longer be carried out unless there are reasons that oblige us to continue or it is necessary to establish, exercise or defend a right in court.</p>	 <p>Access (art.15 GDPR): you have the right to obtain confirmation as to whether or not personal data concerning you are being processed and to obtain information about the processing being carried out.</p>
<p>Automated decision-making process including profiling (art. 22 GDPR): We do not normally make decisions based solely on automated processing of your personal data except in specific areas and only when the decision relates to the finalisation or performance of a contract, when it is based on your explicit consent or is authorised by law.</p>	 <p>Deletion (art.17 GDPR): the GDPR provides for a number of cases in which you have the right to obtain the deletion of personal data concerning you (e.g. if the data is no longer necessary for the purposes for which they were processed).</p>
<p>In the first two cases (contract and consent) we guarantee your right to obtain human intervention, to express your opinion and to object to the decision.</p> <p>You always have the right to receive meaningful information on the logic used and the importance and consequences of automated processing.</p>	 <p>Limitation (art. 18 GDPR): the GDPR provides for a number of cases in which you have the right to request the limitation of the processing of personal data concerning you (e.g. for the period necessary to carry out appropriate checks on personal data whose accuracy you have contested).</p>
 <p>Complaint (art. 77 GDPR): if you consider that your data is being processed by us in breach of the law on the processing of personal data, you have the right to submit a complaint to the competent Data Protection Authority.</p>	 <p>Portability (art. 20 GDPR): the GDPR provides for a number of cases in which you have the right to receive the personal data you have provided to us with about yourself in a structured, commonly used and an automatic machine-readable format. The GDPR also protects your right to transfer this data to another data controller without obstruction on our part.</p>  <p>Rectification (art. 16 GDPR): you have the right to obtain the rectification of inaccurate personal data concerning you, and the integration of incomplete data.</p>

11. HOW CAN YOU CONTACT US AND EXERCISE YOUR RIGHTS

To exercise your rights, you can send your requests to the following addresses:



- Fideuram - Intesa Sanpaolo Private Banking S.p.A.
Registered Office: Piazza San Carlo, 156 - 10121 Torino.
- dpo@intesasanpaolo.com
- privacy@pec.intesasanpaolo.com

We will carry out all necessary actions and communications **free of charge**. Only if your requests prove to be manifestly unfounded or excessive, in particular due to their repetitive nature, may we charge you a fee, taking into account the administrative costs incurred, or refuse to comply with your request.

We may need to amend or supplement this policy, due to regulatory obligations or as a result of organisational changes: you can consult the most update version at any time in the "Privacy" section of our website www.fideuram.it.