



INFORMATION NOTICE FOR VISITORS

Pursuant to Articles 12, 13 and 14 of EU Regulation 2016/679 (General Data Protection Regulation – GDPR)

Dear Sir/Madam,

Pursuant to Articles 12, 13, and 14 of EU Regulation 2016/679, we hereby inform you that the personal data you provide during your visit to the premises of **A.C.E.M. S.R.L.** (hereinafter, the “Data Controller”), Tax Code and VAT No. 02471740163, represented by its Legal Representative **Mr. Gianpaolo Mandaletti**, with registered office in Grassobbio (BG), Via XXV Aprile no. 36, will be processed for the purposes of your identification and for carrying out access and security procedures at our premises.

Origin, Purpose, Legal Basis, Nature of the Processed Data and Provision

Your personal identification data, which may be requested upon entry to the premises, as well as images and/or video recordings captured by surveillance cameras installed on company property, will be collected and subsequently processed by **A.C.E.M. S.R.L.** for the purposes of identification, security, and access control, as well as for the protection of company assets (prevention and possible collection of evidence for the protection of individuals and property against potential assaults, thefts, robberies, damages, and vandalism), for organizational and/or production needs, and to comply with legal, regulatory, or EU obligations.

Providing your data is **mandatory** for the achievement of the purposes indicated above. Processing is based on the legitimate interest of the Data Controller pursuant to Article 6(1)(f) of Regulation 679/2016, as recognized by the Italian Data Protection Authority in its ruling of 10/04/2010. Therefore, consent to processing is not required under Article 6 of EU Regulation 2016/679, since the processing is necessary for identification and for the execution of security and access control procedures at the premises.

Failure to provide such data entitles the Company to deny access to its premises.

Disclosure of Data to Third Parties

Except for disclosures made in compliance with legal obligations or at the request of competent authorities, your data will not be disseminated. For the purposes outlined above,

they may be processed by company personnel and collaborators specifically authorized under Article 29 of EU Regulation 2016/679. Such persons are required to process the data

lawfully, fairly, and only to the extent necessary to perform their duties (so-called “data minimization”).

Data related to video surveillance may be accessed by the Company’s technology partners solely for system maintenance and update purposes.

Your personal data will also be included in the visitor log at the A.C.E.M. S.R.L. premises you are visiting and, in the event of an emergency, processed by the Head of the Prevention and Protection Service or by the Emergency Management Officer, to ensure proper implementation of emergency procedures.

Data will not be transferred to third parties except upon request by Judicial Authorities, for defensive investigations, or to exercise or defend a legal right, or in other cases provided for by law (e.g., access to administrative documents).

With regard to data protection aspects, the data subject is invited, pursuant to Article 33 of EU Regulation 2016/679, to report to A.C.E.M. S.R.L., as the Data Controller, any circumstances or events that may result in a potential **personal data breach**, in order to allow an immediate assessment and the adoption of appropriate countermeasures.

Reports may be sent by email to **amm@flymax.com**.

Methods, Logic of Processing, and Data Retention Period

Your personal data will be processed in written form and/or by electronic, IT, or automated means, strictly in relation to the purposes indicated above, and in all cases ensuring the security and confidentiality of the data.

Access registration data, logs, or images will be retained only for the time necessary to achieve the purposes described, unless further retention is required for the protection of the rights of the data subjects. At the end of this period, data will be automatically deleted from the system.

The IT systems are configured to minimize the use of personal and identifying data. No automated decision-making or profiling will be carried out.

Technical specifications of the video surveillance system are detailed in internal technical reports kept on file.

Areas under video surveillance are clearly marked by informative signage placed near the premises and company grounds, in such a way that individuals are informed before entering the monitored area.

Rights of the Data Subject

In accordance with and within the limits of the applicable data protection regulations (Chapter III of EU Regulation 2016/679), you, as the data subject, have the right to:

- Request confirmation as to whether or not your personal data are being processed;
- Access your personal data;
- Request rectification or erasure of your personal data, and notification of such actions to any recipients to whom the data were disclosed;
- Request restriction of processing in cases provided by law;
- Obtain portability of personal data you have provided, i.e., to receive them from one data controller in a structured, commonly used, and machine-readable format, and to transmit them to another controller without hindrance;
- Object at any time to the processing of your data, and in particular to decisions based solely on automated processing, including profiling;
- Lodge a complaint with the Italian Data Protection Authority pursuant to Article 77 of EU Regulation 2016/679 if you believe that the processing concerning you violates the Regulation.

You may exercise your rights concerning privacy and data protection by requesting the relevant form from **A.C.E.M. S.R.L.**, completing it, and sending it either by registered mail to the registered office of the Data Controller, or by email to **amm@flymax.com**.

Kind regards,

A.C.E.M. S.R.L.