

## **Information on the processing of personal data through the system that provides video surveillance and detection of number plates, in accordance with Art. 13 of Regulation (EU) No. 2016/679 (“GDPR”)**

On the grounds of the company, **Aeroporto Guglielmo Marconi di Bologna S.p.A.** (hereinafter, “**AdB**” or the “**Data Controller**”), as well as inside the Passenger Terminal and in the vicinity of the gates providing access to front vehicle lanes, subject to traffic limitations, and at the entrances to the Data Controller’s airport car parks, systems are operating that perform video surveillance and the reading of number plates of vehicle in transit. The aforementioned systems are appropriately marked in relation to their respective range of action with special signs that display the notice “VIDEO SURVEILLANCE AREA”, in accordance with the Provisions on Video Surveillance of the Italian Data Protection Authority of the 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](mailto:info@bologna-airport.it).

### **Data Protection Officer (DPO)**

E-mail address: [dpo@bologna-airport.it](mailto:dpo@bologna-airport.it).

### **Processed personal data**

Video and/or image recordings carried out by the video surveillance system, installed by the Data Controller, in order to provide: (i) the monitoring of individuals/passengers accessing the airport terminal and/or the offices of AdB; (ii) the registration numbers of vehicles in transit and vehicles parked in airport parking bays.

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

#### **Purpose**

The video surveillance system and the number plate detection system are installed for the following purpose:

- 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**

Video surveillance images may be retained for 7 days, starting from the moment when the images are recorded. After this period has elapsed, the images will be automatically deleted by 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](mailto:info@bologna-airport.it), or [parcheggi@bologna-airport.it](mailto: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 connected with them (in accordance with Art.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 the data referred to in Art. 16 of the GDPR are not practically exercisable, in consideration of the intrinsic nature of the data that is processed (images collected in real time in connection with an objective fact). The right to data portability may not be exercised, in accordance with Art. 20 of the GDPR, since the processing of data is performed in execution of the legitimate interest of the Data Controller.

The data subject may request viewing of the images in which they believe they appear by submitting or attaching suitable identification documents to their 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.