

NOTICE REGARDING VIDEO SURVEILLANCE

In accordance with art. 13 of EU Regulation 2016/679

Introduction:

In compliance with current privacy regulations (European Regulation 2016/679 "GDPR" Art. 13, Guarantor's Provision regarding video surveillance Art. 3.1 of April 8, 2010, as well as Legislative Decree No. 196/03 and subsequent amendments and integrations), the following information is provided regarding the processing of personal data collected through the video surveillance system at Catania Airport and Comiso Airport. This information complements the content of the simplified information, which is provided in accordance with and for the purposes of articles referred to above in order to provide information regarding the video surveillance systems, their use, and your rights.

1. Data Controller:

The Data Controller for personal data is SAC Società Aeroporto Catania S.p.A. Legal and Administrative Headquarters at Aeroporto Fontanarossa 95121 Catania, VAT No. 04407770876 www.aeroporto.catania.it. The Data Controller is the entity responsible for decisions regarding the purposes, methods, and security of personal data.

SAC S.p.A. informs that a video surveillance system has been installed at Catania and Comiso airports, in compliance with the provisions of EU Regulation of the European Parliament and of the Council 679 of 2016, Guidelines 3/2019 on the processing of personal data through video devices - adopted on January 29, 2020, by the European Data Protection Board -, the Guarantor's Provision regarding video surveillance of April 8, 2010, as well as Legislative Decree No. 196/03 and subsequent amendments and integrations. The video surveillance systems have been installed by SAC S.p.A., also in compliance with current airport security regulations (such as, for example, EU Regulation 1998/2015 and subsequent amendments, EU Regulation 300/2008 and subsequent amendments, the National Security Program for Civil Aviation).

2. Data Protection Officer:

The Data Protection Officer (DPO), also known by the acronym DPO, ensures compliance with data protection regulations and cooperates with the supervisory authority (the Guarantee for the Protection of Personal Data). The contact email of our Data Protection Officer is: dpo@aeroporto.catania.it.

3. Other Autonomous Data Controllers and Data Processors:

The video surveillance system is shared:

- By law enforcement agencies, for the purpose of safeguarding public safety and order, as well as for the prevention of terrorism and acts of unlawful interference against air transport. With regard to such systems, law enforcement agencies are autonomous data controllers pursuant to applicable regulations.
- With the company SAC service srl, a company that manages certain security control functions such as parking areas, airport security, and automatic parking ticket machines. SAC Service srl acts as a Data Processor on behalf of SAC S.p.A.
- Access to the data may be granted to service supply companies for assistance and maintenance appointed as external Data Processors pursuant to art. 28 GDPR.

4. Simplified Information art. 3.1 Guarantor's Provision on Video Surveillance:

The video surveillance systems are located in areas indicated by specific signs, in compliance with Guidelines 3/2019 on the processing of personal data through video devices - adopted on January 29, 2020, by the European Data Protection Board, clearly visible under any environmental lighting conditions, where the purposes are also stated. These signs are placed before the range of action of the cameras or in their immediate vicinity.

5. Types of Data Processed:

The personal data processed by SAC S.p.A. consist of images captured through fixed video surveillance systems or installed via body cameras worn exclusively by authorized service personnel. Images are viewed by operators in real-time. The images may also refer to special categories of data referred to in art. 9 GDPR and are subject to recording.

Affected parties may include individuals such as clients, passengers, client and supplier personnel, employees of the Data Controller, its principals and contractors, guests, escorts, and any individuals present with or without authorization, transiting through sterile areas, enclosed and open structures, elevators, escalators, finger gates, hangars, warehouses, and parking areas owned and managed by the Data Controller and its subsidiaries and affiliates.

6. Legal Basis and Purposes of Data Processing by the Controller:

The collected data are processed through video surveillance systems within airport areas and parking lots at Fontanarossa Airport and Comiso Airport by SAC for the purposes of protecting and safeguarding the company's assets, airport safety and security, security of passengers' and clients' belongings and properties, crime prevention, public order and national and international security control, as well as logistical and operational purposes related to applicable regulatory provisions. The legal bases for processing are:

- Art. 6, p.1 lett. f., GDPR – legitimate interest

The processing operations in question are necessary for the pursuit of a legitimate interest of SAC, justified also by the obligations to which SAC S.p.A. is subject as an airport operator. In particular, the purposes relate to the protection of SAC S.p.A.'s assets, assistance in the proper functioning of finger services, assets, and the safety of its employees, collaborators, guests, clients, passengers, economic operators, and authorized public operators operating within airport areas, customers, the protection of properties and equipment of Domains owned, entrusted on concession to SAC S.p.A. and which must be returned at the end of the concession period, and for defensive purposes in the event of disputes involving SAC S.p.A. in any capacity for facts and events that may be subject to capture and recording by video surveillance systems, in compliance with current legislation on the legitimate acquisition of evidence in civil, criminal, and administrative proceedings.

- Art. 6, p.1 lett. c., GDPR legal obligation

In relation to the purpose of airport security contained in European (REG EU 1998/2015) and national regulations (National Security Program for Civil Aviation ed. 2016), it is provided that SAC S.p.A. - as the airport operator - must ensure that public areas and passenger terminal areas are equipped with electronic control systems to assist security activities and that the activities of public and private entities of public, aeronautical, and vehicular traffic are carried out correctly and in compliance with the law and regulations.

The images are connected to the Police Forces, which operate as independent authorities. As also resulting from the aforementioned signage, the captured images are recorded on digital media and stored for a period not exceeding 7 (seven) days and may also be used by the Police Forces, which have the authority to access the system, and by the Judicial Authority, which may request the extraction of footage, or by entities that may request them and have the power to obtain them in accordance with the law or by SAC S.p.A. itself in the cases provided.

The data are processed for the following purposes:

- Public Order and Security, with particular reference to the type of location and compliance with airport security provisions contained in European (EU Regulation 1998/2015) and national (National Civil Aviation Security Program, ed. 2016) regulations;
- Property Protection, with particular reference to the protection of properties and equipment owned by the State, entrusted on lease to SAC S.p.A., which must be returned at the end of the lease, and properties owned by third parties;
- Detection, prevention, and control for the safety of passengers, employees, operators, air and vehicular traffic, any non-compliance and failures of public and private operators operating within the facilities managed by SAC S.p.A., and for the management of accidents;
- Defence reasons. In order to effectively protect SAC, even as a result of offenses committed by anyone, and to protect the interested parties or third parties with a legitimate interest. For this reason, data retention and their disclosure to

third parties with a legitimate interest may be provided for, subject to SAC's evaluation and to the authorized public, judicial, and administrative authority under the law, and of course to the data subjects of the processing.

7. Recipients and Categories of Processed Data:

Data collected through the video surveillance systems are processed solely by authorized operators of SAC S.p.A. for the pursuit of purposes and obligations incumbent upon the Controller as an airport manager.

The data may be made available to State Bodies/Police Forces and Public Authorities, judicial authorities, and for the purpose of complying with legal obligations.

Additionally, Sac Service s.r.l. also has access to live image viewing, which carries out airport security control services at Fontanarossa Airport on behalf of SAC S.P.A. as an external Data Processor under Article 28 of the GDPR and in cooperation with the Police.

Access to the images is granted only to personnel expressly authorized and appointed based on the company's privacy organizational chart.

Regarding SAC Service personnel, the Data Controller, SAC S.p.A., has mandated that the Data Controller adopt the same guarantees for authorized access to information as required for its own organization.

Only in the event of incidents, crimes, damages, breaches, or events that require subsequent verification by SAC, including upon request from legitimately interested third parties, data relating to the occurrence will be saved and stored until the conclusion of the procedure, including any judicial proceedings resulting from the aforementioned events.

Under no circumstances will your data be subject to unauthorized disclosure.

Access to the data may be granted to service supply companies for assistance and maintenance, appointed as external Data Processors under Article 28 of the GDPR.

The video surveillance system is duplicated at the Border Police for the performance of its institutional tasks. The data collected are processed exclusively by authorized personnel or designated data processors or by the Police.

Data collected through such systems are nevertheless processed by SAC S.p.A. as the Controller in compliance with applicable regulations, using strictly connected computer and telematic tools, ensuring their security and confidentiality. They are not transmitted to subjects other than those indicated in the previous article or located outside the EU. Personal data is not subject to dissemination and/or communication to third parties located outside the European Economic Area. Should this occur, SAC S.p.A. commits to ensuring the transfer to countries, entities, and companies that offer verified and suitable guarantees similar to those provided by current European legislation.

8. Period of retention of personal data and criteria used:

The personal data subject to processing consist of images captured through a video surveillance system and are stored by the same on digital media for a period not exceeding 7 (seven) days, after which they are automatically deleted.

In special cases, as explained above, in compliance with the law, they may be extracted and stored for a longer period. In such cases, a specific motivated formal act is drawn up, such as in the event of an incident that occurred within the airport area, in the event of damage to goods, even those owned by third-party clients, suppliers, and operators, in the event of a workplace accident involving an employee of the data controller or of suppliers and contractors of SAC or of guests, customers, visitors present in the airport area, in the event of a request from the police forces or the judicial authority or other entities or authorities with competence in relation to airport security, national security. In cases where the data is requested by third parties other than those listed above to protect their own subjective right, SAC will proceed to retain the data and, before granting the data to third parties, will assess the balance of interests between the right to the protection of personal data of the data subjects and the underlying right to the request being pursued. The decisive element in the evaluation will be the provision that such data may legitimately be requested by the judicial authority in any ongoing legal proceedings. The data is processed in compliance with current regulations through

computer and telematic tools, with logic strictly related to the indicated purposes, in order to guarantee the security and confidentiality of the data itself.

9. Rights of the data subject:

As known, EU Regulation 2016/679 Arts. 15-22 — GDPR grants data subjects the possibility, in compliance with the specific technical specifications of the system, to exercise specific rights; the data subject may obtain from the Data Controller: access, rectification, erasure, oblivion, restriction of processing. The aforementioned rights may be limited based on obligations arising from legal provisions or from the performance of contracts, or from the function performed by the Data Controller. In this case, notwithstanding the correctness of the processing carried out in accordance with the law by the Data Controller, the data subject may exercise:

- The right of access under Article 15, exclusively if the conditions are met and to the extent that the exercise of this right does not infringe on the rights and freedoms of other subjects (as indicated by the Guidelines of the European Data Protection Board of January 29, 2020, on the processing of personal data through video devices). It remains understood that in cases where the images are subject to exclusive availability by public institutions/Police Forces, SAC S.p.A., if it is no longer in possession of the images because they have been provided to the police forces or to the public authorities authorized for this purpose, cannot fulfill any requests that may be addressed to competent bodies.
- The right to object under Article 21. In the event the right to object is exercised, the Data Controller reserves the right not to comply with the request, and therefore to continue processing, if there are compelling legitimate reasons for the processing that override the interests, rights, and freedoms of the data subject.
- With reference to recorded images, the right to update, rectify, or integrate is not concretely exercisable due to the intrinsic nature of the collected data, as they are real-time images concerning an objective fact.
- With regard to the right to erasure and the exercise of the right to be forgotten, it is represented that the data, as mentioned, will be automatically deleted after 7 days in an irreversible manner, except for the exercise of the right to defense by SAC and within the limits indicated above by subjects with a legitimate current interest and evaluated as such on the basis of the above. At the request of the judicial authority, at the request of the police forces, or of other authorized public authorities under the provisions of the law, the data will be retained or transferred to the requesting authority. In these cases, SAC S.p.A. will not delete the data until its own right has been legitimately satisfied, the legitimately exercisable right of third parties, or until authorized by the public authority ordering the retention or in the case of transfer to a public authority SAC S.p.A. will not be able to fulfill the request.

The aforementioned rights may be exercised by submitting a request without formality to the Data Protection Officer (DPO) at the address indicated in point 2 of the information. The Data Controller will respond in any case within a reasonable time, within 30 days. In cases of particular complexity or due to prevailing reasons, the response may be provided within longer timeframes, but in any case, you will be duly notified. In the event the Data Controller refuses to satisfy your requests, the reasons for the refusal will be provided. The right to lodge a complaint directly with the Supervisory Authority as provided for in Article 77 of the GDPR before the Guarantor Authority for the protection of personal data by connecting to the website <https://www.garanteprivacy.it>. The data subject also has the right to object to processing by submitting a request to the Data Protection Officer (DPO) whose contact details are indicated in the previous Article 2. Further explanations you may need regarding the exercise of your rights and any requests can be submitted in writing, accompanied by a valid identification document, to SAC - Società Aeroporto Catania S.p.A., headquartered in Catania, Aeroporto Fontanarossa or at the email address provided.