



## Privacy policy

### Data processed in connection with the COVID-19 emergency

To the employees, collaborators and visitors of the company.

Pursuant to Article 13 of EU Regulation n. 2016/679 (hereafter "GDPR"), we inform you that the data you provide is processed following the adoption of the regulatory protocol for measures to combat and contain the spread of the Covid-19 virus in the workplace.

#### Object of treatment

The data processed by SAE COMUNICAZIONE INTEGRATA SRL may refer to:

- Real-time temperature detection before accessing the workplace, if applicable. The acquired data and the name of the interested party will not be registered, unless the 37.5 °C temperature threshold is exceeded, only if it should be necessary to document the reasons that have prevented access to the company premises.
- Writing of a statement certifying whether or not the person comes from epidemiological risk areas and has come into contact with people tested positive for COVID-19.
- Persons in this condition will be momentarily isolated, provided with masks and shall not go to the Emergency Room and/or to the company infirmary. Instead, they shall contact their family doctor as soon as possible and follow his or her indications.

NB:

- Only data that are necessary, adequate and relevant to the prevention of the COVID-19 infection will be collected. In case a statement about contacts with persons found positive to COVID-19 is requested, only the name of the person who tested positive will be requested, with no additional information.

#### Legal basis for processing

The legal basis ensuring the legitimacy of the data processing refers to:

- Implementation of anti-infection safety protocols pursuant to art. 1, n. 7, letter d) of the Italian Prime Ministerial Decree of 11th March 2020.
- General principles for workplace protection and health - art. 6 par. 1 letter c) legal requirement (art. 2087 of the Italian civil code and legislative decree 81/08 on the protection of workplace health and safety) and letter d) protection of the vital interest of



operators who collaborate with the Controller and of other natural persons such as visitors - art. 9 par. 2 letter b).

### **Purpose of data processing**

Data processing is aimed at protecting the health of employees, collaborators and visitors who, for any reason, access the company premises, and at the retracing of the chain of “close contacts [that] a worker who tested positive for COVID-19” may have had.

### **Processing method**

For the purpose of prevention, trained and instructed staff will measure body temperature (so-called fever) using specific tools. The data will be processed solely for the purpose of preventing COVID-19 infection and will not be in any way disseminated or disclosed to third parties outside specific legal requirements. All necessary measures to ensure that the worker’s privacy and dignity are respected will be taken.

### **Data retention time**

The Controller will process and retain the personal data collected until the end of the state of emergency.

### **Access to processing**

The processing will be carried out solely by properly trained staff assigned to the task, selected among subjects internal or external to the company organisation.

### **Communication of data**

The data will not be disseminated or communicated in any way to third parties outside legal requirements (ex: in case of request by the Health Authority to trace back the chain of “close contacts [that] a worker tested positive for COVID-19” may have had).

### **Transfer of data**

Personal data will in no way be transferred outside the European Union.

### **Nature of data provision and consequences of refusal to respond**

The provision of data for the purposes referred to in point 3.1 above is mandatory, and the absence of data shall prevent access to the company premises.

### **Rights of the data subject**

According to the GDPR provisions, the data subject has the following rights against the data Controller:

- obtain confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data (Right of access, art. 15);



- obtain the rectification of inaccurate personal data concerning him or her without undue delay (Right to rectification, art. 16).
- obtain the erasure of personal data concerning him or her without undue delay and the Controller shall have the obligation to erase personal data without undue delay where certain conditions are met (Right to erasure, art. 17);
- obtain restriction of processing where some circumstances apply (Right to restriction of processing, art. 18);
- receive the personal data concerning him or her, which he or she has provided, in a structured, commonly used and machine-readable format and have the right to transmit those data to another Controller without hindrance from the Controller to which the personal data have been provided, where some conditions are met (Right to data portability, art. 20);
- object, at any time, on grounds relating to his or her particular situation, to processing of personal data concerning him or her (Right to object, art. 21);
- Receive without undue delay communication about the personal data breach suffered by the data Controller (art. 34).

Where applicable, the interested party can exercise the rights indicated above by means of e-mail or mail. The data Controller reserves the right to verify the identity of the interested party before taking further action in connection to his or her request. For any complaint, the interested party also has the right to lodge a complaint to the Personal Data Protection Authority.

**Data Controller**

The data Controller SAE COMUNICAZIONE INTEGRATA SRL, via Cagnola 3, 20154 Milan, Italy

E-mail: [privacy@saecomunicazione.it](mailto:privacy@saecomunicazione.it)

I have read the statement (signature) \_\_\_\_\_