



INFORMATION REGARDING PERSONAL DATA FOR THE PREVENTION OF COVID-19 INFECTION

UPDATED AS OF 18/05/2020

Information regarding the processing of personal data in accordance with art. 13 and 14 of EU Regulation UE 679/2016

We inform you that, before entering the company, you will be asked to undergo a body temperature control.

If your temperature proves to be higher than 37.5°C, access will be denied.

With this document, we inform you that, in accordance with art. 13 of EU Regulation 679/2016 (hereafter 'GDPR'), the data you provide to us for the prevention of COVID-19 infection will be processed as follows, while fully respecting the principles of correctness, lawfulness, transparency, and the protection of your privacy and rights.

Data Processor (those who decide how and why your data is processed)	The Data Processor LAGOFUTURO SRL Address: Via Balicco n. 109, 23900 Lecco (LC), c.f. e p.iva 03503700134 E-mail: info@biancarelais.com
Purposes of the processing (why your data is processed)	The purpose of the processing is to prevent COVID-19 infection, safeguard people within the company, and collaborate with the public authorities, also with a view to the eventual reconstruction of any chain of infection.
Lawful basis for processing and the nature of provision	<p>Your data will be processed for the aforementioned ends relating to the implementation of anti-infection safety protocols in accordance with art. 1, no. 7, letter d) of the Prime Ministerial Decree of 11 March 2020, the Shared Protocol of 14 March 2020, the Protocol of 24 April 2020 and any subsequent integrations and modifications, as well as for social protection, relevant public interest, the protection of health and safety in workplaces, and the safeguarding of the vital interests of operators collaborating with the Data Processor.</p> <p>With regard to the indicated processing, the Data Processor will be made aware of:</p> <ol style="list-style-type: none">1. Body temperature identified in real time, which will not be recorded or retained for any reason other than that cited in point 2;2. Identification data and the recording of temperatures that exceed the threshold only where necessary in order to document the reasons why access is denied or why individuals are not allowed to remain in company buildings; as well as, in this case, the recording of data regarding any temporary isolation, such as the time of exiting isolation and the circumstances outlined by the interested party to justify their exiting temporary isolation;3. Any situations where there is a danger of COVID-19 infection, including data relating to health status, such as, for example, body temperature/flu symptoms; travel from zones at epidemiological risk; presence/absence of any contact over the last 14 days with people with a positive COVID-19 result;4. Data relating to the state of health of those who have received a "negative" COVID-19 swab result;5. Any situations of particular vulnerability and any current or past illnesses of employees.6. Identification data regarding the clients who book. <p>Where this data is not provided, access to company building will be denied.</p>

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Recipients (subjects who may receive this data)	Aside from the Data Processor, other subjects who may have access to the Data are those involved in the organisation (specifically nominated staff) or external subjects (a competent doctor or, on the request of the authorities, other authorised subjects such as, for example, the Ministry for Health or Health Protection Agency). Requests for the updated list can be made to the Data Processor at any time.
Circulation	Your data will not be circulated.
Processing method	The Data Processor adopts the necessary security measures to prevent the unauthorised access to, or circulation, modification, or destruction of Personal Data. Processing is carried out using IT and/or electronic tools and manually in the form of hardcopy archives, with organisational methods and logic relating strictly to the purposed outlined.
Data transfer overseas	Your data will not generally be transmitted to non-EU third-party countries or international organisations. It is however possible that certain bodies acting on behalf of the Data Processor have databases in countries outside of the European Economic Area (EEA); in this case, said bodies will execute the relevant contractual measures to ensure that data is provided adequate protection, also thanks to agreements based on contractual clauses such as those adopted by the European Commission.
Retention period	We inform you that the retention period for your data (in cases where it is necessary to record it, i.e. where body temperatures exceeds the threshold) is generally considered to be until "the end of the state of emergency", but data may also be retained based on indications provided by the Ministry for Health, the Health Protection Agency or any other body designated to carry out epidemiological inquiries. The identification data of clients with bookings will be kept for 14 days. We reserve the right to retain personal data and details for a longer period, in accordance with the limitation period, to satisfy requirements connected to the exercising of the right of defence in case of litigation.
Rights	In the cases provided for, interested parties have the right to obtain access to their personal data, to correct or cancel said data, to limit the processing of said data or oppose processing (articles 15 et seq. of the Regulation). Interested parties who deem that the processing of personal data relating to them and carried out according to the methods here described is in violation of that foreseen by the Regulation have the right to appeal to the Guarantor, in accordance with art. 77 of the Regulation itself, or initiate legal proceedings with the relevant judicial authorities (art. 79 of the Regulation). How to exercise your rights To exercise your rights, you can send a request using the contact details of the DPO/Data Processor indicated in this document. Requests are made free of charge and handled as quickly as possible, and within a maximum of one month.

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