

PRIVACY STATEMENT PURSUANT TO ART. 13 OF EU GENERAL DATA PROTECTION REGULATION 2016/679 (REGULATION)

Dear Sir,
Dear Madam,

pursuant to art. 13, EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 ("**Regulation**"), Istituto Mediterraneo per i Trapianti e Terapie ad Alta Specializzazione and UPMC Italy, both with registered office in Discesa dei Giudici 4, 90133 Palermo, Italy (hereinafter, respectively, "**ISMETT**" and "**UPMCI**" or "**Joint controllers**"), in their capacity of joint controllers, inform you that in their premises of Palermo, in Via Tricomi 5, Discesa dei Giudici 4 (3rd floor), Via Pietro Geremia 29, and Via Roccazzo 85, a video surveillance system has been installed (hereinafter, respectively, "**Premises**" and "**System**").

The aforementioned system was installed to ensure the safety of patients, employees, and assets contained in the aforementioned Premises and to facilitate the exercise of ISMETT's and UPMCI's right of defense. The system is active within the Premises, in the areas opposite the entrances of Via Tricomi and Via Geremia, as well as in the vehicle access areas. Areas equipped with surveillance cameras are indicated with a specific sign. A map of all surveillance cameras can be found in each front desk and in the public relations office (URP).

Images are kept for a maximum of 72 hours (for Via Tricomi, Via Geremia, and Via Roccazzo), 48 hours (for elevator entrance areas on the 2nd and 3rd floors in Discesa dei Giudici), and 24 hours (for all remaining areas in Discesa dei Giudici) after their recording, except in the case of specific investigations requested by the judicial authority or judicial police or should the storage be necessary for the protection of one's interests. After these storage periods, images are recorded over previous images.

The processing of the data through the System does not require data subjects' consent, since it is in the legitimate interest of the data controller (art. 6(1)(f) of the Regulation ("*processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party*"), as required by EDPB Guidelines 3/2019 on processing of personal data through video surveillance systems - version 2.0, 29 January 2020, as well as the guidelines on video surveillance and personal data protection, in FAQ format, published by the Italian Personal Data Protection Authority ("**Garante**") on 3 December 2020.

Only appointed staff may access recorded images, and exclusively in one of the following cases:

- In the event of a suspected or committed offense;
- in the event of system maintenance;
- if a data subject has requested to access them;
- upon request from the competent judicial authority or judicial police.

The updated list of subjects who may have access to the images can be found at the Data controller - Security Services Area - by sending a communication to direzionegenerale@ismett.edu or to Discesa dei Giudici 4, 90133 Palermo, Italy. Recorded images will not be disseminated to third parties.

Joint controllers of personal data processing are Istituto Mediterraneo per i Trapianti e Terapie ad Alta Specializzazione and UPMC Italy, both with registered office in Discesa dei Giudici 4, 90133, Palermo, Italy.

The ISMETT data protection officer (DPO) can be contacted at ISMETT S.r.l. - Responsabile della Protezione dei Dati, Discesa dei Giudici 4, 90133 Palermo, Italy, or dataprotectionofficer@ismett.edu.

As a data subject you have the right to obtain authorization from the joint controllers to access or delete, and to limit or deny the processing of your personal data ([art. 15 et seq., Regulation](#)). Requests must be filed to ISMETT's DPO (ISMETT S.r.l. - Responsabile della Protezione dei Dati, Discesa dei Giudici 4, 90133 Palermo, Italy; email: dataprotectionofficer@ismett.edu) or to the Data controller - Security Services Area at direzionegenerale@ismett.edu. A template of the request is available from the Italian Personal Data Protection Authority ("**Garante**") [website](#).

Should you deem your personal data has been processed in breach of the Regulation, you have the right to file a [complaint to the Italian Personal Data Protection Authority \("**Garante**"\)](#) (art. 77, Regulation) or to start judicial proceedings (art. 79, Regulation).

Last update: October 2022