



Information Notice for video surveillance in accordance with Art. 13 of EU Regulation 2016/679 and EDPB's Guidelines 3/2019 on processing of personal data through video devices

In accordance with Regulation EU 2016/679 (hereinafter the "**GDP Regulation**" or the "**GDPR**") and existing national regulations on the protection of personal data (the "**Data Protection Law**"), the CNPD guidelines on video surveillance of September 2023 and the EDPB's Guidelines 3/2019 on processing of personal data through video devices (hereinafter the "**Guidelines**"), Mediobanca International Immobilière S.à r.l., with registered office in 4 Boulevard Joseph II, L-1840 Luxembourg (hereinafter "**MBII**" or "**Immobilière**" or the "**Controller**"), as Data Controller, is required to provide an Information notice on the use of personal data.

Therefore, Immobilière

INFORMS

That at the registered office of 4 Boulevard Joseph II, L-1840 Luxembourg, there is a closed-circuit video surveillance system in place, operative in compliance with the Guidelines.

The system is outside the building and does not monitor tenant's employees work activities.

Purpose of processing

The personal data of data subjects, specifically their images acquired by means of recording, is collected exclusively for the following purposes:

- ◆ security: protection of the safety of company/tenant workers and/or collaborators and third parties;
- ◆ protection of corporate/tenant assets: prevention of thefts, robberies, damage, and acts of vandalism.

Legal basis

Data is processed lawfully, even without the specific consent of the data subjects, in accordance with Art. 6 of the GDPR. The legal basis for the data processing is the legitimate interest of MBII, in compliance with the Guidelines.

Processing method

The data is processed electronically in compliance with suitable data security and protection measures and always for the above purposes.

More specifically, in processing the data, MBII declares it will comply with the following principles:

- ◆ Lawfulness of processing: data processed by means of video surveillance takes place correctly and for specific, lawful purposes (security and protection of assets).
- ◆ Need for the processing: Immobilière undertakes not to use the system excessively and where not necessary.
- ◆ Proportionality of processing: the data collected is strictly necessary to achieve the purposes pursuant to the point above.

Disclosure to third parties and dissemination of data

The data in question will not be disseminated and will only be disclosed by the Controller to the legal authority or judicial police, when specifically requested.



Minimum information notice

Data subjects are specifically notified by posting notices (simplified information notices) in the areas and premises subject to video surveillance.

Image storage time

The data acquired will be stored for up to 8 days; after this period of time, data will be erased by being recorded over, without prejudice of Authority or Judicial Police requests or in any case following a criminal event, damage to corporate assets, unauthorised access to the premises by staff and/or third parties, theft of company materials and products.

Rights of the data subject

Pursuant to art. 15 and following articles of GDPR, you are entitled to request details of the personal data Immobilière holds about you and how it processes it. You also have a right to have it rectified (art. 16 GDPR) or deleted (art. 17 GDPR), to restrict (art. 18 GDPR) MBII's processing of that personal data, to have your personal data transferred (art. 20 GDPR) directly from us to another controller, and to object to the processing. You may also have the right to lodge a complaint in relation to MBII processing of your personal data with the local supervisory authority, the Commission Nationale pour la Protection des Données (the "**CNPD**").

If you object to the processing of your personal data, MBII will respect that choice in accordance with legal obligations.

Please be aware that these rights are not always absolute and there may be some situations in which, technically or legally, Immobilière may not be able to comply with your request.

The rights should be exercised by means of written communication sent to:

Mediobanca International Immobilière S.à.r.l.

Attention: Sole Manager
4, Boulevard Joseph II
L-1840 Luxembourg

The Controller, directly or through designated facilities, shall process your request and provide you, without undue delay, with full information on the action taken in respect of your request.

Data Controller

The Data Controller is Mediobanca International Immobilière S.à.r.l., with registered office in 4, Boulevard Joseph II, L-1840 Luxembourg.

Any request on the above described processing shall be sent to:

Mediobanca International Immobilière S.à.r.l.

Attention: Sole Manager
4, Boulevard Joseph II
L-1840 Luxembourg

Mediobanca International Immobilière S.à.r.l.