



## **INFORMATION NOTICE ON PERSONAL DATA PROCESSING – PHOTOGRAPHIC DOCUMENTS/IMAGES/VIDEO RECORDINGS Pursuant to Article 13 of Regulation (EU) 2016/679 regarding the protection of natural persons with regard to the processing of personal data**

### **1. Purposes and legal basis of the processing**

Markas S.r.l. reserves the right to process, free of charge, personal data such as photographic documents/images/video recordings depicting the individual concerned for the following purposes:

- Publication, communication, and dissemination on social media and company websites;
- Creation of possible informational material and editorial activities on digital/telematic support.
- Other activities related to the company's core business.

The data will only be processed with the express consent of the data subject, pursuant to Article 6, paragraph 1, letter a) of the Regulation.

### **2. Provision of data**

The provision and use of personal data is optional and it is considered a free and voluntary service. It will only occur with the express consent of the data subject. Any refusal to provide the requested data will result in the impossibility of processing the data by the Company.

### **3. Types of data processed**

Only for the purposes outlined above, the following categories of data may be processed: personal data such as photographic documents/images/video recordings.

### **4. Processing methods**

The processing will be carried out using both manual and electronic systems by authorized individuals in compliance with the law and with the use of appropriate organizational and technical measures to ensure the confidentiality of the data and prevent unauthorized third-party access. The Data Controller commits to ensuring that the photographic documents, audio/video recordings will not be used in any way that could damage the dignity, reputation, or decorum of the data subject.

### **5. Data retention period**

Personal data will be retained only for the period necessary to fulfill the purposes for which they were collected and processed, and this is specifically linked to the type of data being processed, as explicitly indicated in the Record of Processing Activities, the related information notices on personal data processing, and the company procedures to which reference is made.

Except for any longer retention period required to fulfill legal obligations due to the nature of the data or document or in compliance with specific legal requirements, or for a maximum of ten years pursuant to Article 2220 of the Civil Code, the estimated retention period will not exceed 2 years from the termination of the employment relationship, in full compliance with the principle of data retention limitation.

### **6. Communication of data to third parties**

In relation to the purposes indicated, your personal data may be communicated to third parties in contractual relations with the Data Controller, appointed as Data Processors (Article 28 of the Regulation), when the communication of data is necessary or functional to the performance of our activities. The data collected may be transferred to companies within the Markas group only for the purposes indicated above and processed by authorized personnel.

Your data will not be included in automated decision-making processes and will not be disclosed, transferred, or communicated to third countries outside the European Economic Area (EEA).

**Disclosure:** Your personal data may be disclosed within the limits relevant to the processing purposes and in the manners outlined above.



## 7. Rights of the data subject

Under current legislation, the data subject may, at any time, request access to their data. The data subject has the right to withdraw their consent at any time. Furthermore, if the data is deemed inaccurate or incomplete, the data subject may request its correction or supplementation. If the legal conditions are met, the data subject may object to the processing of their data, request its deletion, or request restriction of processing. In the case of restricted processing, excluding storage, personal data subject to such restriction can only be processed with the consent of the data subject, for the judicial exercise of a right of the Data Controller, to protect the rights of a third party, or for reasons of significant public interest. If the data subject has exercised their rights under Articles 16, 17(1), and 18 of Regulation (EU) 2016/679, Markas S.r.l. will communicate to the recipients to whom the personal data has been transmitted any corrections, deletions, or restrictions on processing carried out. The data subject also has the right to data portability to another data controller. If you believe your rights have been violated, you have the right to lodge a complaint with the Data Protection Authority: [www.garanteprivacy.it](http://www.garanteprivacy.it).

### Data controller

Markas S.r.l.  
via Macello n. 61 (39100), Bolzano, Italy.  
Phone: (+39)0471307611  
E-mail address: [it-privacy@markas.com](mailto:it-privacy@markas.com)

### Responsabile della protezione dei dati personali (DPO)

Renorm S.r.l.  
via Macello n. 50 – 39100 Bolzano, Italy.  
Phone: (+39)04711882777  
E-Mail address: [renorm@legalmail.it](mailto:renorm@legalmail.it)

The Data Controller  
Markas S.r.l.