



Chatterbox Playschool and Primary School – Scuola Paritaria

Via Tempio, 15 – Cagliari Tel 070 7738269

VIDEO SURVEILLANCE REGULATION

Chatterbox Srl, with headquarters in Cagliari via Tempio n. 15, in the person of the legal representative, manager of the nursery school in viale la Playa n. 11 Cagliari

GIVEN art. 4 of Law 300/1970 which governs the installation of audio-visual systems within companies;

GIVEN the Legislative Decree 30.6.2003 n. 196 "Code regarding the protection of personal data entered into force on January 1, 2004;

GIVEN the "Provision relating to cases to be removed from the notification obligation" of the Guarantor for the protection of personal data on 31 March 2004, published in the Official Gazette of 6 April 2004, no. 81, and in particular point 6), letter e);

GIVEN the "General measure on video surveillance" of the Guarantor for the protection of personal data dated 29 April 2004, which updates and integrates the provision of 29 November 2000 (so-called "decatalogue") published in the Guarantor's Bulletin no. 14/15, p.2. HAVING REGARD to the "Provision on video surveillance - April 8, 2010" TAKING NOTE of art. 3.1 of the "General measure on video surveillance" of 29 April 2004, which provides:

- a) A minimum information to interested parties who must be informed of access or transit in a video surveillance area and any registration, as per the simplified model of "minimum" information identified by the Guarantor, to be implemented by means of warning signs;
- b) the integration of the minimum information with a detailed notice, which contains the elements of Article 13 of the Privacy Code, with particular regard to the purposes and possible storage of the collected data;

Given the EU Regulation 2016/79 which in Article 13 has integrated the information already provided for by the Privacy Code and the new provisions dictated on personal rights

CONSIDERED

that the "minimum" information is fulfilled through the placement of special signs near the main entrance and in the installation areas of the cameras;



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CONSIDERED

that the same "General measure on video surveillance" establishes in art. 3.5 that the reasons for the choices, referred to in the previous articles of the same general provision on video surveillance, concerning the security requirements of the recorded data, "must be adequately documented in an autonomous deed stored with the owner and the data processor and this also for the purposes of any exhibition during inspection visits, or the exercise of the rights of the data subject or of litigation";

CONSIDERED

the authorization issued by the Cagliari-Oristano Territorial Labor Directorate Prot 48926 of 22 September 2015 and Prot 48296/48299

the authorization issued by the Territorial Inspectorate of Cagliari - Oristano Prot 12362/12363 of 20/03/2018

Chatterbox in its capacity as manager as specified above, having heard the report of the Headmaster regarding the need to install and use video cameras inside and outside the two aforementioned offices

DELIBERATES

The following "regulations for the installation and use of cameras" within the aforementioned schools

REGULATION FOR THE INSTALLATION AND USE OF CAMERAS INSIDE AND OUTSIDE THE INSTITUTE

Art. 1 Purpose

With the video surveillance project, the institute wants to enhance the tools in its possession for the control and surveillance of accesses in order to protect the building and school assets from vandalism and theft and in general for reasons of personnel safety and of heritage protection.



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Art. 2 Technical characteristics of the system

For the headquarters in Viale La Playa n.11, the system consists of a video surveillance system consisting of 3 Sercomm brand internal fixed cameras (model RC8026B / W) and 1 Honeywell brand external camera (model HED3PR3).

Following a motion-detection signal (movement of individuals), the cameras send the images to the NVR which at that point begins recording.

The internal cameras are activated only during the closing hours of the Institute, the external ones are active 24 hours a day.

The recorded images can be viewed remotely by authorized persons if alarms for intrusion, fire or other have been reported. The cameras allow video shooting even with low night lighting.

The cameras are installed in the following areas:

kindergarten location (Playschool) in viale la Plaia n. 11, Cagliari

- a) main entrance hall
- b) back entrance
- c) free activities classroom
- d) external back entrance

The viewing angle of the cameras will only concern the areas most exposed to the risk of theft or robbery and in any case in compliance with the aforementioned privacy legislation for the purposes of protecting security and corporate assets. The resumption of employees can take place exclusively for this purpose and on an occasional basis.

The equipment cannot be operated remotely to change orientation.

Art. 3 Responsibility for the management and processing of images.

The data controller (Chatterbox Srl) manager of the aforementioned preschools has designated in writing the person responsible for the processing of the images in the person of Ms. Tessa Percopo, legal representative.

Ms. Tessa Percopo, pursuant to Law 675/96, is responsible for the management and processing of the images (which are not archived). She monitors the use of the systems and



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the processing of data and images in accordance with the purposes pursued by the Institute and other regulatory provisions governing the matter and in particular any provisions issued by the Guarantor Authority for the protection of personal data.

The data processor designates and appoints in writing the persons in charge to whom she entrusts the specific tasks and requirements for the use of the systems.

The appointees appointed are Mrs. Francesca Olivieri (RLS) and Mr. Gian Claudio Collu (external IT department manager).

For the exercise of the rights referred to in art. 13 of Law 675/96, the customers of Chatterbox Srl may contact the person in charge of data management and processing at the Institute, in accordance with the methods and procedure provided for by art. 17 of D.P.R. 501/98 and according to the provisions of the European Regulation.

Art. 4 Principles of relevance and non-excess

The processing carried out through the Institute's video surveillance system will be based, in line with the fundamental principles established by Law 300/1970, Law 675/96 and Legislative Decree no. 196/03 ("Code regarding the protection of personal data") to the principles of correctness, relevance and non-excess, lawfulness, necessity, proportionality and purpose and in compliance with fundamental rights and freedoms, as well as the dignity of persons, with particular reference to the protection of confidentiality, personal identity and the right to the protection of personal data of persons, as prescribed by the provision of the Guarantor for the protection of personal data of 11/29/2000 (so-called "decatalogue") published in the Guarantor's Bulletin n. 14/15, updated and integrated by the "General measure on video surveillance" of 04/29/2004.

With reference to the principles of relevance and non-excess of the data processed with respect to the purposes pursued, the cameras will be installed in such a way as to limit the viewing angle of the shoot, avoiding when not essential as in the hypothesis referred to in the following art. 6 detailed images, enlarged or details not relevant to not allow the recovery of the facial features of people and any other detail suitable for their identification.

In any case, it is forbidden to disclose or disseminate images, data and news of which one has become aware of using the systems, as well as to make any enlargements of the images outside the cases governed by this regulation. It is forbidden to use images that, even accidentally, may have been taken, for purposes of control, even indirectly, on the professional activity of employees, in accordance with the provisions of art. 4 of Law 20/05 1970 n. 300 (Workers' Statute), and without prejudice to the procedure provided for in the same article.



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Although not governed by this document, please refer to the provisions of the Code regarding the protection of personal data and the general provisions of the Guarantor for the protection of personal data and the European Regulation. The information to which this document accesses specifies purposes, no need for consent, times and methods of cancellation, possibility of access and methods of appeal as required by the European Regulation.

Art. 5 Investigations of offenses and investigations by Judicial Authorities or Police

Except for the necessary maintenance, the person in charge and those in charge of video surveillance may proceed to view the recorded images only with the authorization of the public security and judicial authorities. In such cases, by way of derogation or as prescribed in the recovery procedures defined by the previous art. 4, the persons in charge will be able to enlarge the shooting of the images strictly necessary and not exceeding the specific purpose pursued and to record them on magnetic media. The information collected pursuant to this article may

access the police and judicial authorities. The same devices can also be used in relation to investigations by the Judicial Authority or the Police.

Art. 6 Conservation of images and custody of magnetic or optical media.

The conservation

The conservation of the images is limited to twenty-four hours after the detection, subject to special needs for further conservation in relation to holidays or closure of offices or businesses, as well as in the event that a specific investigative request by the judicial authorities or judicial police. The registrations are put to disposition of the Judicial Authority or other public authorities only in the presence of provisions issued by them. Any images recorded in accordance with Article 5 must be immediately deleted if the data controller does not intend to inform the police or the judicial authorities.

Art. 7 Informative

The school with suitable signage and specific communications will inform of the existence of the video surveillance service, also providing an indication of the person in charge to whom they can contact for the exercise of the rights referred to in art. 13 of Law 675/9, to the families of the pupils at the time of enrolment, the school staff at the time



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of hiring into service and the operators of companies who for work reasons serve in the Institute. This regulation will be published on the Institute's website.

A copy of the same can be requested from the owner or data processors, as well as from the administrative office. The same notice may be supplemented or modified with a subsequent provision, in the event of a change in the conditions of application.

Art. 8 Implementing and referral provisions

This regulation is removed from the obligation to notify the guarantor pursuant to Provv. March 31, 2004, n. 1/2004 relating to the cases to be removed from the notification obligation (published in the Official Gazette 6 April 2004, no. 81; web doc. No. 852561) and the Provision on video surveillance - 8 April 2010 which in paragraph 3.2.3. Titled Notification provides "It is a general rule that the processing of personal data must be notified to the Guarantor only if they fall within specifically envisaged cases (Article 37 of the Code). In relation to the provisions of lett. f), of paragraph 1, of art. 37, this Authority has already provided that the processing of data carried out for exclusive purposes of security or protection of persons or assets should not be notified, even if relating to illegal or fraudulent behaviour, when images or sounds collected are temporarily stored".

Although not regulated in this regulation, please refer to the provisions of the Code regarding the protection of personal data and the general provisions of the Guarantor for the protection of personal data referred to above and in the European Regulation.

Cagliari li, 13/01/2021