



COMUNE DI GENOVA

SECOND LEVEL PRIVACY NOTICE – AREA WELFARE CITTADINO VIDEO SURVEILLANCE SYSTEM

1. Subject

This privacy notice, which supplements the content of the simplified first-level notice, is provided pursuant to Articles 12, 13 and 14 of the GDPR, Article 3.1 of the Italian Data Protection Authority's Measure on Video Surveillance of 8 April 2010 (Video Surveillance Measure), Article 7.2 (Second-level information) of the Guidelines on the processing of personal data in relation to video surveillance services No. 3/2019 issued by the EDPB (European Data Protection Board), and the Regulation governing Video Surveillance approved by City Council Resolution No. 89 of 09.11.20210, for the purpose of informing that video surveillance systems are in operation near the access points and within certain areas of the premises of the Comune di Genova, in compliance with the above-mentioned provisions and with full respect for your rights.

2. Simplified information pursuant to Article 3.1 of the Video Surveillance Measure and Article 7.1 of the EDPB Guidelines

Video-surveilled areas are indicated by appropriate warning signage in accordance with Article 3.1 of the Video Surveillance Measure and the EDPB Guidelines No. 3/2019. Such signage is clearly visible under all ambient lighting conditions and also indicates the purposes of the processing, the rights of the data subjects, the Data Controller, and the contact details of the DPO for the exercise of rights.

The signage is placed before the field of view of each camera or in its immediate vicinity and not necessarily in direct contact with the equipment; it is designed and positioned so as to be clearly visible under all ambient lighting conditions. Where several cameras are installed, multiple information signs are displayed, depending on the size of the area and the recording modalities.

3. Data Controller

The Data Controller is the Comune di Genova, Via Garibaldi 9, Palazzo Tursi – 16124 Genova, Tax Code 00856930102, represented by the Director of Direzione Welfare Territoriale e Integrazione Sociosanitaria and by the Director of Servizi per la Fragilità e la Vulnerabilità Sociale.

The Municipality of Genoa has a Data Protection Officer (DPO), who may be contacted at the following addresses: rpd@comune.genova.it – dpo.comge@postecert.it

4. Purposes of the processing

The video surveillance systems have been installed for the following purposes:

- **Protection of the physical integrity of employees and service users** – monitoring the safety of employees and of individuals present, in any capacity, within municipal offices, and preventing acts of aggression or threats;
- **Protection of municipal property** – monitoring the integrity, preservation and safeguarding of the movable and immovable assets of the Municipality of Genoa.

The Data Controller undertakes not to use the collected data for purposes other than those indicated above, unless additional consent has been obtained from the data subject.

5. Legal basis for the processing

The legal basis for the processing lies in the necessity to perform a task carried out in the public interest or connected with the exercise of official authority, pursuant to Article 6(1)(e) of the EU Regulation (GDPR).



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Furthermore, the processing activity is carried out as described in the Regulation governing Video Surveillance approved by City Council Resolution No. 89 of 09.11.2010 and on the basis of the provisions set forth in a specific trade union agreement n.06 del 02/07/2026.

6. Recipients or categories of recipients of the personal data

The data will be processed exclusively by personnel and collaborators of the Data Controller (in particular, the Direzione Welfare Territoriali e Integrazione Socio-Sanitaria, the Direzione Servizi per Fragilità e Vulnerabilità Sociale, the Direzione Technology Office, and the Local Police Department) or by companies expressly appointed as data processors.

Outside of these cases, the data will not be disclosed or communicated to third parties, without prejudice to situations in which it is necessary to communicate them to other subjects involved in investigative activities and in cases specifically provided for by national or European Union law.

By way of example only, the data may be communicated to the Judicial Authority and to the Judicial Police in the context of criminal investigation activities, following a reasoned request arising from a report or complaint.

7. Categories of personal data processed

Video surveillance consists of a set of tools aimed at remote monitoring, carried out through video recording devices, image capture and any subsequent analysis, connected to a control center. No real-time audio monitoring or audio recording is carried out.

Personal data are collected through video recordings and image capture by camera systems installed at the territorial offices of the Area Welfare Cittadino. The systems capture and record images that allow the direct or indirect identification of the individuals concerned.

The cameras are equipped with an AI-based system that may be used exclusively for rapid search purposes and not for any other activities that could constitute profiling.

8. Transfer of data to a third country

Your data will not be transferred outside the European Union.

9. Image retention period

The personal data subject to processing are stored at the offices of the Direzione Sistemi Informativi and are accessible only to authorized personnel.

Personal data recorded through the video surveillance system are retained for a period not exceeding seven days from the date of collection. After this period has elapsed, the recorded data are automatically overwritten.

Where necessary, Local Police operators will download the images locally onto their own devices and retain them for the period required for investigative purposes, as well as in accordance with specific requests that may be received from the Prefectural and Judicial Authorities and from law-enforcement agencies.

10. Data subject rights

Data subjects may exercise their rights by contacting the Data Controller in accordance with the procedures identified and communicated to them through this privacy notice.

In relation to the processing of personal data concerning them, and pursuant to Articles 15 et seq. of the GDPR, upon submission of a specific request, the data subject has the right:



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Comune di Genova | Area Welfare Cittadino |
Via di Francia 3 – Matitone – 6° Piano | 16149 Genova |
Tel 0105577280 - 77320 |
e-mail: servsociali@comune.genova.it |
pec: politichesocialicomge@pcert.postecert.it



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- to obtain from the Data Controller confirmation as to whether or not personal data concerning them are being processed and, where that is the case, to obtain access to such data;
- to be informed about the purposes and methods of the processing, the recipients or categories of recipients to whom the personal data may be disclosed, and the personal data retention period;
- to request erasure where one of the grounds set out in Article 17 of the GDPR applies, anonymization, or restriction of processing carried out in violation of the law, including data whose retention is not necessary in relation to the purposes for which they were collected or subsequently processed;
- to object, at any time, on grounds relating to their particular situation, to the processing of personal data concerning them, pursuant to Article 21 of the GDPR.

Requests for the exercise of rights may be submitted to the Direzione Welfare Cittadino, pursuant to Article 38(4) of the GDPR, either by registered letter sent to the address of the Data Controller or by certified email (PEC) at the following address: politichesocialicomge@pcert.postecert.it



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