



Personal Data Processing Policy
to verify the possession of COVID-19 Green Passes for access to the workplace

The **Company GEMM SRL** is required to verify the COVID-19 Green Pass in compliance with the provisions of articles 9-quinquies (for public administrations) and 9-septies (for private companies) of DL 22 April 2021, no. 52, with the procedures defined by the Prime Ministerial Decree (DPCM) of 17 June 2021, making use of the specific application *C19 Verification*, for access to its workplaces for people who have to carry out a work activity, whether they are also employees of third-party companies in charge of carrying out particular activities (e.g. employees of the contractor, suppliers, etc.), as well as for carrying out the work activities of its employees for third parties. However, those who are exempt from the vaccination campaign are excluded from the obligation to possess and show the Green Pass, while remaining required to present a specific medical certification issued in accordance with the indications provided by the Ministry of Health.

Highlighting how the entry by workers without a Green Pass constitutes a violation of the rule punishable with a specific administrative fine, and how the Company/Entity may also be liable for violations for not having carried out the necessary checks on the use of the Green Pass by its workers and employees of third-party companies or for not having defined the operating procedures for carrying out the checks, the following information is issued pursuant to article 13 of EU Regulation 679/2016 (GDPR) regarding the processing of personal data following the carrying out of the verifications.

Data Processing Controller

The Data Processing Controller is **GEMM SRL** based in CODOGNE', VIA DEL LAVORO 37, VAT 03441880261, contact details: tel. 0438 778504, e-mail privacy@gemm-srl.com.

Processing purposes and legal basis

The processing of personal data is aimed exclusively at verification, by the Company/Entity, as employer, the possession of valid COVID-19 Green Passes necessary to allow its employees and third-party employees who must carry out a work activity at the same Company/Entity, to access the places where work activities are performed, or even its employees and collaborators to access third-party workplaces.

The legal basis of the data processing is constituted by the need to fulfill a legal obligation to which the Data Controller is subject (pursuant to articles 9-quinquies and 9-septies of Legislative Decree no. 52/2021 and in compliance with article 13 of the Prime Ministerial Decree of 17.6.2021), as well as to perform a task of public interest or connected to the exercise of public powers, respectively pursuant to article 6, paragraph 1 letter c) and e) of the GDPR. Furthermore, the processing is necessary for reasons of significant public interest pursuant to article 9, paragraph 2, letter g) of the GDPR.

GEMM srl

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Categories of data processed

As part of the COVID-19 Green Pass verification process, only personal data referable to the aforementioned workers and employees of third-party companies will be processed.

More specifically, the following will be processed:

- common personal data referred to in article 4, no. 1 of EU Regulation 679/2016, i.e.: name, surname, date of birth;
- data relating to health, falling within the particular categories of data referred to in article 9 of the GDPR, only if related to showing medical certification for subjects exempt from the vaccination campaign;
- data relating to the outcome of the verification regarding the possession of valid COVID-19 Green Passes.

Data processing methods and retention

The data will be processed by specifically authorized persons with a formal processing deed, using exclusively the C19 Verification application in a specific SMARTPHONE device, which allows only extemporaneous reading of the authenticity, validity and integrity of the Green Pass and which allows checking with the national platform - DGC the same Green Pass by reading the QR Code present in the Green Pass. The verification process therefore allows only data consultation and display. The results of the verifications, relating to the possession or otherwise of a valid COVID-19 Green Pass, returned by the national platform-DGC, will in no way be stored in any analogue or digital form.

The provision of data is mandatory for access to the places of conduct of the work, as required by current legislation; if not provided, it will not be possible to access them.

Recipients of the Green Pass data communication

Personal data, processed solely for the achievement of the verification purposes indicated above, and by means of extemporaneous reading only, excluding any form of storage of the same data, will not be communicated by the Data Controller to third parties, except to the personnel office of the company and the data processors appointed for the management of pay, for any measures provided for by the emergency rules for employees without valid Green Pass.

Therefore, in the case of ascertained violations of the obligations from which submission to the competent Prefecture derives, the personal data referable to those who have committed such violations may be stored by the Data Controller for these purposes and will be subject to subsequent communication to the Prefecture for the related sanctioning measures.



Transfer of personal data to third countries or international organizations

There are no automated decision-making processes or transfers of personal data to third countries (outside the EU) or international organizations.

Rights of interested parties and complaints

Pursuant to article from 15 to 21 of the GDPR, interested parties may exercise the rights provided therein, including: the right of access (article 15), the right of rectification (article 16); the right to cancellation (article 17), opposition (article 21): moreover, in the cases provided for, they may file a complaint with the Privacy Guarantor.

Codogné 07/10/2021

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