

Information on the processing of personal data for verifying possession of COVID-19 green certification ("Green Pass") for access the workplace

The **Rössl e Duso** Company is required to verify the COVID-19 green certificate (so-called "Green Pass"), in compliance with the provisions of art. 9-septies of the D.L. 22 April 2021, n. 52, with the procedures defined by the Prime Ministerial Decree of 17 June 2021, making use of the specific application "VerificaC19" and subsequent authorized by law, for access to their workplaces for people who have to carry out a work activity, whether they are also employees of companies third parties in charge of carrying out particular activities (e.g. contractor employees, suppliers, etc.), as well as for carrying out the work activities of their employees for third parties. However, those who are exempt from the vaccination campaign are excluded from the obligation to possess and exhibit the Green Pass, but are required to present a specific medical certificate issued in accordance with the instructions 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 can also answer for violations for not having carried out the necessary checks on the use of the Green Pass by of 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 released pursuant to Article 13 of EU Regulation 679/2016 (so-called "GDPR") regarding the processing of personal data resulting from carrying out the checks themselves.

Owner of the data processing

The data controller is Rössl e Duso Srl with registered office in Via Monte Grappa, 49 - 31050 Veduggio (TV), VAT number 04553120264, contact details: tel. 0039 0423 400332, e-mail: info@rossleduso.com.

Purpose of the processing and legal basis

The processing of personal data is aimed exclusively at verifying, by the Company, as employer, the possession of the valid COVID-19 green certifications (so-called "Green Pass") necessary to allow its employees and staff third parties who must carry out a work activity at the same Company / Body, to access the places of execution of the work activities, or even to their employees and collaborators to go to the workplaces of third parties.

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 art.9-septies of Legislative Decree no. 52/2021 and in compliance with art.13 of 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 art. 6, par. 1 letter c) and e) of the GDPR. Furthermore, the processing is necessary for reasons of significant public interest pursuant to Article 9, par. 2, let. g) of the GDPR.

Categories of data processed

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

More specifically, the following will be treated:

- common personal data referred to in art. 4, n.1 of EU Regulation 679/2016, namely: name, surname, date of birth;
- data relating to health, falling within the particular categories of data referred to in art. 9 of the GDPR, only if they relate to the exhibition of medical certification for subjects exempt from the vaccination campaign;
- data relating to the outcome of the verification of the possession of the valid COVID-19 green certification.

Methods of data processing and storage

The data will be processed by persons specifically authorized with a formal act for processing, using exclusively the "VerificaC19" application and subsequent ones authorized by law inserted in a specific smartphone or reader device provided by the Company, which allows only extemporaneous reading of the authenticity, validity and integrity of the certification and which allows you to check the same "Green Pass" with the national DGC-Platform by reading the QR Code present in the Green Pass. The verification process therefore allows you to carry out only the data consultation and display operations. The results of the verifications, relating to the possession or not of a valid COVID-19 green certification, returned by the national platform-DGC, will in no way be stored in any hard copy or digital format. The provision of data is mandatory for access to the places where the work takes place, as required by current legislation; failing this, it will not be possible to access them.

Recipients of the certification 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 HR 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 certification.

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 art. from 15 to 21 of the GDPR, the interested parties have the possibility to 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, you can lodge a complaint with the Privacy Guarantor.

Vedelago, on October 5th 2021

The company
Rössl e Duso Srl