



**PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA – VIDEO SURVEILLANCE OF PREMISES
PURSUANT TO THE FEDERAL ACT ON DATA PROTECTION (FADP) AND THE GENERAL DATA PROTECTION REGULATION (GDPR)**

1. DATA CONTROLLER

Immobiliare Mantegazza SA, represented by its Legal Representative pro tempore, with registered office at **Riva Paradiso 2, 6902 Paradiso**, acting as the Data Controller, informs data subjects that, in compliance with the Swiss Federal Act on Data Protection (FADP) and, where applicable, Regulation (EU) 2016/679 (GDPR), their personal data will be processed in accordance with the aforementioned legislation, in observance of the principles of fairness, lawfulness, proportionality, and transparency, while safeguarding confidentiality and the rights of data subjects.

2. PURPOSES OF THE PROCESSING

Images and video surveillance data are processed exclusively for the following purposes:

- to protect movable and immovable property, including for evidentiary purposes in the event of theft, damage, vandalism or disputes relating to the use of premises and infrastructures;
- to ensure the safety and physical security of employees, clients, suppliers and all individuals accessing or transiting within the monitored areas;
- to control access and prevent intrusions, unauthorized access or unlawful conduct, particularly in sensitive areas (such as, by way of example, safes, IT infrastructures, technical rooms, protected PPP areas and similar);
- to comply with requests from judicial authorities, law enforcement agencies or other competent authorities;
- to establish, exercise or defend legal claims of the Data Controller, whether in judicial or extrajudicial proceedings.

Video surveillance systems are not used for remote monitoring of employees' work activities, but exclusively for security purposes, protection of individuals and safeguarding of assets.

3. LEGAL BASIS AND JUSTIFICATION / PRINCIPLES OF LAWFULNESS

Under the FADP, the processing does not require the data subject's consent, as:

- it is based on the overriding interest of the Data Controller in ensuring the security of buildings, protecting individuals and property, preventing unauthorized access and safeguarding its assets.

Where applicable, under the GDPR, the processing does not require the data subject's consent as it is based on the following legal grounds pursuant to Article 6:

- legitimate interest of the Data Controller (Article 6(1)(f) GDPR), consisting in ensuring security, preventing unlawful acts, protecting company and real estate assets, and defending its legal rights;
- compliance with legal obligations (Article 6(1)(c) GDPR), where the processing or disclosure of data is required by applicable law or by competent authorities.

The Data Controller has carried out a balancing test and considers that the processing is proportionate, necessary for the purposes pursued and does not override the rights and freedoms of the data subjects.

For the protection of employees, the processing is also carried out in compliance with Articles 328 of the Swiss Code of Obligations (CO) and 30 FADP.

In case of requests from judicial or public authorities (such as police, public prosecutors, courts or other public bodies), the relevant legal provisions shall apply.

4. METHODS OF PROCESSING

The processing is carried out through video recording systems installed in buildings managed by Immobiliare Mantegazza SA.

Recordings may take place continuously (24/7) or, in some cases, be triggered by motion detection or specific events.

Access to the images is logged and subject to internal control measures.

The presence of cameras is indicated by appropriate signage or pictograms placed at building entrances and/or in the monitored areas.

Data are processed exclusively by specifically authorized personnel or by duly appointed external data processors acting under documented instructions from the Data Controller.

Processing is carried out using methods and measures suitable to ensure data security, confidentiality, integrity and availability, through appropriate technical and organizational safeguards.

The system is configured in accordance with the principles of data minimization, purpose limitation and storage limitation, as well as privacy by design and by default, where applicable.

The processing does not involve profiling activities or automated decision-making processes within the meaning of applicable legislation.

Immobiliare Mantegazza SA

Via Serafino Balestra 17 – Casella Postale CH - 6901 Lugano
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5. PERSONAL DATA PROCESSED

The following personal data may be processed through video surveillance systems:

- images and video recordings captured by cameras, without audio recording, unless otherwise expressly permitted by law;
- data relating to the location, date and time of recording;
- any additional technical information or metadata strictly necessary for the operation, management and security of the system. Recording is limited to areas relevant to the stated purposes, including, in particular, private property, common areas, entrances, exits, access points, maneuvering areas, sensitive areas or areas otherwise relevant for security purposes.

6. NATURE OF DATA COLLECTION AND CONSEQUENCES OF FAILURE TO PROVIDE DATA

The provision of personal data through video recording does not occur via forms or direct communication by the data subject, but is a consequence of accessing, staying in or transiting through areas subject to video surveillance, which are appropriately signposted.

Failure to provide data, understood as the intention not to be recorded, may result in the inability to access or remain in the monitored areas, unless this is incompatible with the nature of the area or with the Data Controller's security obligations.

Data processing is carried out strictly within the limits necessary to achieve the purposes outlined in this privacy notice.

7. DATA RETENTION PERIOD

Recorded images are retained for a maximum period of **72 hours**, unless a longer retention period is required due to specific circumstances, such as:

- legal obligations;
- requests or orders from competent authorities;
- the need to establish, exercise or defend legal claims in judicial or extrajudicial proceedings;
- investigative needs related to unlawful acts, damage, intrusions, incidents or security events.

After this period, data are deleted by automatic overwriting or through other technical means ensuring secure erasure.

Recording equipment and storage devices are located at the premises or buildings managed by Immobiliare Mantegazza SA, in areas accessible only to authorized personnel. Access to systems is protected by secure credentials and appropriate security measures.

Where applicable, any extended retention periods will be limited to what is strictly necessary and in compliance with the principles of proportionality, data minimization and storage limitation under the FADP and GDPR.

8. DISCLOSURE AND RECIPIENTS OF DATA

Access to personal data collected through video surveillance systems is restricted to:

- employees of Immobiliare Mantegazza SA who are specifically authorized;
- external processors duly appointed for system management, maintenance, technical support, surveillance or security services;
- competent authorities, where required by law or upon formally legitimate request.

Personal data are stored at the Data Controller's premises and/or at those of designated processors and are mainly processed within the territory of the Swiss Confederation.

The data are not subject to public disclosure.

Any transfers to European Union or EEA countries are carried out on the basis of the mutual adequacy decision between Switzerland and the European Union.

Where it becomes necessary to transfer personal data to third countries, this will take place only to countries ensuring an adequate level of protection or subject to appropriate safeguards, in accordance with the FADP and Articles 44 et seq. GDPR.

9. DATA SUBJECTS' RIGHTS

Pursuant to the Federal Act on Data Protection (FADP), data subjects may exercise their rights at any time with respect to the Data Controller by contacting:

Phone: **+41(0)91 960 54 54**

E-mail: davidepianca@mantegazza.ch

Postal address: **Riva Paradiso 2 - Casella Postale 6902 Lugano 2 Caselle**

You have the right to:

- access your personal data and obtain a copy thereof;
- obtain the rectification or updating of inaccurate or incomplete data;

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- request the deletion of data that are no longer necessary or unlawfully processed;
 - request restriction of processing in the cases provided for by law;
 - request the transfer of your data to you or to third parties, where technically feasible (Art. 28 FADP and Art. 20 GDPR);
 - object to the processing of your data on grounds relating to your particular situation.

You retain the right in Switzerland to lodge a complaint with the [Federal Data Protection and Information Commissioner \(FDPIC\)](http://www.edoeb.admin.ch/en) (www.edoeb.admin.ch/en).

Where the GDPR applies, you also have the right to lodge a complaint with the competent Supervisory Authority in the EU Member State where you reside or work, or with the [European Data Protection Supervisor \(EDPS\)](http://www.edps.europa.eu/en) (www.edps.europa.eu/en).

[Additional Information](#) | [Amendments](#) | [Entry into Force](#)

The Controller reserves the right to amend or update this notice. Any update will be made available to data subjects, indicating the effective date.

Last updated: 27 March 2026

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