

VIDEO SURVEILLANCE PRIVACY NOTICE

Pursuant to the applicable privacy legislation (EU Regulation 2016/679 “GDPR” and Italian Legislative Decree No. 196/2003, as subsequently amended and supplemented), the following notice is provided regarding the processing of personal data collected through the video surveillance systems operating at Naples International Airport.

DATA CONTROLLER

GESAC S.P.A., with registered office at Naples Capodichino Airport – 80144 Naples, is the independent Data Controller with regard to the data processed through the video surveillance systems installed at Naples International Airport.

The video surveillance systems were installed by GESAC S.p.A. in compliance with the applicable airport security regulations (including, by way of example, EU Regulation 1998/2015, as amended, EU Regulation 300/2008, as amended, the National Civil Aviation Security Programme and the Italian Navigation Code).

The video surveillance systems consist of several installations located throughout the different airport areas and comprise approximately 700 cameras designed to ensure the highest level of security and monitoring.

DATA PROTECTION OFFICER

GESAC S.p.A. has appointed a Data Protection Officer (“DPO”), pursuant to Article 37 GDPR, domiciled for the purposes of the office at the Company's registered office and reachable at: dpo@gesac.it

CATEGORIES OF DATA PROCESSED

The personal data processed by GESAC S.p.A. are as follows:

- Images/videos of natural persons captured through video surveillance systems, including those enhanced with artificial intelligence systems, and through visual sensors installed in airside and landside operational areas, which are viewed by duly appointed and instructed operators acting as authorized persons for processing purposes strictly connected with and necessary for the tasks assigned to them by GESAC S.p.A.

The images may also relate to special categories of personal data pursuant to Article 9 GDPR.

PURPOSES AND LEGAL BASIS OF PROCESSING

The data collected are processed through video surveillance systems within the airport premises (internal and external areas) for the following purposes:

a) protection and safeguarding of company assets and the exercise of rights in defence thereof.

Legal basis: legitimate interest (Article 6(1)(f) GDPR).

Processing operations for the purposes referred to under point a) are necessary for the pursuit of GESAC S.p.A.'s legitimate interests, justified by the obligations imposed on the company for the protection of its infrastructure and assets and for the exercise of legal actions before the competent authorities in its own defence.

b) airport safety and security relating to the protection and safeguarding of individuals and the prevention and combating of criminal offences and terrorist acts, as well as logistical and operational purposes connected with Article 705 of the Italian Navigation Code and subsequent amendments, and any other applicable legal and regulatory provisions.

Legal bases: compliance with a legal obligation (Article 6(1)(c) GDPR) and performance of a task carried out in the public interest (Article 6(1)(e) GDPR), in accordance with the applicable legislation.

With regard to the safety and security purposes referred to under point b), the applicable legislation provides that GESAC S.p.A., as an airport operator carrying out activities of public relevance, must

ensure that airport areas (internal and external) are equipped with electronic monitoring systems supporting security activities concerning passengers, baggage and cargo.

Where processing involves special categories of data, the legal basis is substantial public interest (Article 9(2)(g) GDPR), as the processing is necessary for reasons of substantial public interest and for the protection of public security.

PROCESSING METHODS

Data are processed in compliance with applicable legislation by means of IT and electronic tools, using methods strictly related to the purposes indicated above, in such a way as to ensure the security and confidentiality of the data.

DATA RECIPIENTS

Data collected through the video surveillance systems are processed exclusively by operators appointed by GESAC S.p.A. for the sole pursuit of the purposes and obligations incumbent upon it as airport operator.

In accordance with the applicable legislation, the data may be made available to State Bodies, Police Forces and Public Authorities acting as independent Data Controllers, in order to comply with legal obligations.

Specialised technical, IT and maintenance service providers appointed as Data Processors pursuant to Article 28 GDPR may also have access to the data.

RETENTION PERIOD

The systems retain images solely for the purposes indicated above, with a retention period of 7 days. Once the retention period has elapsed, the images are deleted through an automatic overwriting system.

Images are retained for a period not exceeding that necessary to achieve the purposes for which they are collected or subsequently processed, as well as for any period required by law for administrative purposes, management of complaints/disputes or criminal proceedings, in compliance with the principle of data minimisation, taking into account supervisory authority decisions, case law and legal obligations, particularly those relating to civil liability, social security, health and safety at work under national and European legislation.

TRANSFER OF DATA OUTSIDE THE EU

Personal data are not disclosed and/or transferred to third parties located outside the European Economic Area. Should this become necessary, the transfer will take place in compliance with Articles 44 et seq. GDPR and service providers will be selected among those providing adequate safeguards pursuant to Article 46 GDPR.

DATA SUBJECT RIGHTS

Data subjects may exercise the rights granted by Regulation (EU) 2016/679 (GDPR), including the rights of access (Art. 15), erasure (Art. 17), restriction of processing (Art. 18) and objection (Art. 21), subject to the conditions and limitations set out in the GDPR and, in particular, taking into account the rights and freedoms of third parties and the EDPB Guidelines of 29 January 2020 on processing through video devices.

Requests may be sent to the DPO at dpo@gesac.it or to the Data Controller at privacy@gesac.it. If a request is rejected, the reasons for the refusal will be provided.

Given the nature of the processing and the type of personal data involved, consisting of images collected in real time and relating to objective facts, it is not possible to request rectification, updating or completion of personal data pursuant to Article 16 GDPR.

Data subjects also have the right to lodge a complaint with the Italian Data Protection Authority

pursuant to Article 77 GDPR through www.garanteprivacy.it or by email to garante@gdpd.it or protocollo@pec.gdpd.it.

CHANGES AND UPDATES

The Data Controller reserves the right to amend and/or update this notice.

Last updated: March 2026.