

Privacy Policy on the processing of personal data of Visitors pursuant to art. 13 of the GDPR

Pursuant to the current legislation on the protection of personal data (the "**Privacy Regulations**") including the EU Regulation 2016/679 (the "**GDPR**"), as well as Italian Legislative Decree 196/2003 as amended by Italian Legislative Decree 101/2018, **Geico S.p.A.**, in its capacity as data controller (the "**Company**" or the "**Data Controller**"), informs visitors (including all those who will access the head office of the Data Controller for business reasons, whether Italian or foreign) (the "**Data Subjects**" or the "**Visitors**" or, in the singular, the "**Data Subject**" or the "**Visitor**") that the personal data provided or collected during their visit to the head office of the Company will be processed in strict compliance with the Privacy Regulations, for the purposes and in the manner described in this policy (the "**Privacy Policy**").

1. WHO IS THE DATA CONTROLLER?

The Data Controller is Geico S.p.A., with registered office at Via Pelizza da Volpedo 109/111, Cinisello Balsamo (MI), 20092, Italy, VAT No. 00688580968, which can be contacted via the phone number +39 02 660221 or at the following e-mail address infoprivacy@geico-spa.com

2. WHAT TYPE OF PERSONAL DATA WILL BE COLLECTED?

The Data Controller processes the following personal data, collected from the Data Subjects during the selection phase and during the job interview and, subsequently, during the establishment and execution of the employment relationship:

- **identification and contact data of the Visitor**, such as: name and surname, date of birth and other personal identification elements contained in ID cards; company to which the Visitor belongs; data relating to the verification of Certifications, including possession or non-possession of the same.

3. FOR WHAT PURPOSES WILL PERSONAL DATA BE PROCESSED AND ON WHAT LEGAL BASIS WILL SUCH PROCESSING TAKE PLACE?

The Data Controller informs the Data Subjects that the personal data collected by the Company prior to the establishment of the employment relationship, during the course of the same or after its termination, will be processed, through automated and manual methods, for the following purposes (the "**Purposes**"):

Purpose of the processing	Legal basis of data processing	Nature of personal data provision
Ascertain the identity of external individuals accessing the Company's offices and keep track of the entrances and controls carried out, with the sole purpose of guaranteeing the physical safety of visitors and employees, also in compliance, from time to time, with the provisions of the regulations in force on hygiene, health and safety at work.	Art. 6(1)(c) of the GDPR: legal obligation to which the Data Controller is subject.	The provision of personal data for the Purpose of this Privacy Policy is optional. However, failure to provide such information may make it impossible for the Visitor to access the Company's offices.
Protect the company's assets and prevent any theft or damage and, more generally, protect the company's know-how	Art. 6(1)(f) of the GDPR: legitimate interest of the Data Controller to guarantee the security and confidentiality of the company's assets.	

If the legal basis of the processing is the legitimate interest of the Data Controller, the latter guarantees to have previously carried out an assessment aimed at ensuring the proportionality of the processing so that the rights and freedoms of the Data Subjects are not prejudiced, taking into account the reasonable expectations of the same in relation to the specific processing activity carried out.

Data Subjects may request additional information about the above assessment by sending an email to the following address: [infoprivacy@geico-spa.com].

The Data Controller also informs the Data Subject that s/he has the right to **object** to the processing of his/her Personal Data carried out on the basis of legitimate interest of the Company.

If the Company intends to use the personal data for any other purpose that is incompatible with the Purposes for which they were originally collected or authorised, the Company will inform the Data Subject in advance and, when required, will request consent for further processing of the data.

4. HOW WILL PERSONAL DATA BE PROCESSED?

In relation to the indicated Purposes, the processing of Visitors' personal data may consist of the activities indicated in Article 4, paragraph 1, no. 2) of the GDPR, namely: collection, recording, organisation, storage, consultation, processing, disclosure by transmission, or otherwise making available, restriction, erasure or destruction of Personal Data.

In addition, the personal data of the Data Subjects will be:

- processed in compliance with the principles of **lawfulness, correctness and transparency**;
- collected for the **legitimate Purposes** determined above;
- **adequate, relevant and limited** to the Purposes for which they are processed;
- **stored in a form that allows the identification of the Data Subject for a period of time not exceeding the fulfilment of the purposes** and better defined in point 7 below;
- processed in such a way as to guarantee **adequate security against the risk of destruction, loss, modification, disclosure or unauthorised access by means of technical and organisational security measures**.

Data can be processed through manual, automated, IT and telematic means, according to a logic strictly related to the purposes and, however, in such a way as to ensure the security and confidentiality of data, in addition to compliance with the specific obligations under the Privacy Regulations in force and applicable from time to time.

5. TO WHOM WILL PERSONAL DATA BE DISCLOSED?

The personal data of the Visitors will be processed by the Company's employees, who will be specifically designated as authorised subjects, where processing is required for the fulfilment of the Purposes set out in point 3 of this Privacy Policy.

Furthermore, the Data Controller informs the Visitors that, for the fulfilment of the Purposes, their personal data may be disclosed to further recipients or categories of recipients, in their capacity as autonomous data controllers or, where necessary, specially appointed data processors, including, by way of example but not limited to:

- Company supplying products and/or services for the purposes set out in paragraph 3 of this policy.

Finally, the Data Controller informs the Data Subjects that their personal data will not be disclosed to third parties and will not be disseminated.

6. ARE PERSONAL DATA TRANSFERRED TO COUNTRIES OUTSIDE THE EU?

As part of an **international group**, Geico informs the Visitors that, in order to process the personal data of the Data Subjects for the Purposes set forth in point 3 above of this Privacy Policy, some personal data may be transferred to companies of the Geico group having their registered offices **outside the European Union** (the countries include: **Japan, Russia, Brazil, China, India, Mexico, United Kingdom, United States of America**).

Considering that some of the aforementioned countries do not guarantee an adequate level of protection of personal data compared to that provided in the European Union, the Data Controller has taken steps to ensure that the transfer of the personal data of the Data Subjects to such countries takes place solely in compliance with the conditions set forth in Articles 45/49 of the GDPR and, in particular:

- in Japan: [COMMISSION IMPLEMENTING DECISION \(EU\) 2019/419 of 23 January 2019](#);
- in the United Kingdom: [COMMISSION IMPLEMENTING DECISION \(EU\) 2021/915 of 04 June 2021](#);

Where the Company intends to transfer the personal data of Visitors to non-EU countries other than those mentioned above, such transfer shall take place only in accordance with the conditions set out in Articles 45/49 of the GDPR.

7. HOW LONG WILL PERSONAL DATA BE RETAINED?

The identification data of Visitors will be stored and processed for the period of time strictly necessary to pursue the purpose set forth in Paragraph 3, letters a) and b) of this Privacy Policy and, in any case, for a period of no more than 30 (thirty) days from the date of recording during the visit to the Company's office.

At the end of the retention period, personal data of Visitors will be deleted, unless there are further legitimate interests of the Data Controller and/or legal obligations that make it necessary to retain it, after minimisation.

8. WHAT ARE YOUR RIGHTS IN RELATION TO THE PROCESSING OF YOUR PERSONAL DATA, HOW CAN YOU EXERCISE THEM AND HOW CAN YOU CONTACT US?

The Data Controller informs the Data Subject that s/he will always have, in accordance with the law, the right to revoke at any time his/her consent, where given, as well as to exercise, at any time, the following rights (collectively, the "**Rights**"):

- a) the "**right of access**" and specifically to obtain confirmation of the existence or otherwise of personal data concerning him or her and their communication in intelligible form;
- b) the "**right to rectification**", i.e. the right to request the rectification or, if interested, the integration of personal data;
- c) the "**right to erasure**", i.e. the right to request the erasure, transformation into anonymous form of data processed in violation of the law, including data whose storage is not necessary in relation to the purposes for which the personal data were collected or subsequently processed;
- d) the "**right to restriction of processing**", i.e. the right to obtain from the Data Controller the restriction of data processing in certain cases provided for under the Privacy Regulations;
- e) the right to request from the Data Controller the list of the recipients to whom any rectification or erasure or restriction of processing was notified (in accordance with Articles 16, 17 and 18 GDPR, in fulfilment of the notification obligation except where this proves impossible or involves a disproportionate effort);
- f) the "**right to data portability**", i.e. the right to receive (or to transmit directly to another data controller) personal data in a structured, commonly used and machine-readable format;
- g) the "**right to object**" i.e. the right to object, in whole or in part:
 - to the processing of personal data carried out by the Data Controller for its own legitimate interest;
 - to the processing of personal data carried out by the Data Controller for marketing or profiling purposes.

In the above cases, where necessary, the Data Controller will inform the third parties to whom the Data Subject's personal data are communicated of the possible exercise of rights, except in specific cases where this is not possible or is too costly and, in any case, in accordance with the provisions of the Privacy Regulations.

The Data Subject may at any time exercise his/her Rights in the following ways:

- by email sent to: infoprivacy@geico-spa.com;
- by ordinary mail, to the address of the registered office of Geico S.p.A.: Cinisello Balsamo (MI), Via Pelizza da Volpedo 109/111, 20092, Italy.

9. HOW CAN YOU LODGE A COMPLAINT WITH THE ITALIAN AUTHORITY ("GARANTE")?

The Data Controller informs the Data Subject that, pursuant to the Privacy Regulations, he or she has the right to lodge a complaint with the competent supervisory Authority (in particular in the Member State of his or her usual residence, place of work or place of the alleged breach), if he or she deems that his or her Personal Data are being processed in a manner that would result in a breach of the GDPR.

In order to facilitate the exercise of the right to lodge a complaint, the name and contact details of the European Union Supervisory Authorities are available at the following link https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

Finally, if the Data Subject intends to lodge a complaint with the Supervisory Authority competent for the Italian territory (i.e. Italian Data Protection Authority ("*Garante*")), the complaint form is available at the following link: <https://www.garanteprivacy.it/home/docweb/-/docweb-display/docweb/4535524>.