

# Privacy Notice for Visitors

**Article 13, Data Protection Regulation 2016/679 – GDPR**  
**Article 5, Personal Data Protection Law 45/2021 – PDPL**

**Effective Date: 24/01/2024**

**Version n.: 1.0**

## Data Controller

Pursuant to Article 13 of the EU Regulation 2016/679 (**GDPR**) and Article 5 of the UAE Federal Decree-Law No. 45 of 2021 (**PDPL**), **ISS Global Forwarding One Person Company LLC** (hereinafter "**ISS**", or "**Company**", or "**Data Controller**"), processes personal data from visitors disclosed at the time of access to the Data Controller's premises and facilities.

## Purposes and legal basis

The collected personal data are used for the sole purpose of:

- a) allowing visitors to enter the Company's premises following the issuance of a badge;
- b) the protection of the Data Controller's premises and business assets;
- c) the exercise of the Data Controller's rights in court and the management of any litigation;
- d) the prevention and suppression of unlawful acts;
- e) the safeguard of the vital interests of the data subject, in particular to ensure his/her safety and security within the Data Controller's premises.

The legal basis for this processing of personal data is compliance with a legal obligation to which the Data Controller is subject (Art. 6 par. 1, let. c, GDPR, art. 4, par. 9, PDPL and art. 13 of Federal Decree-Law 33/2021).

## Personal data

The personal data processed for the aforementioned purposes are:

1. identity information (name, surname, society).

## Data retention period

The Data Controller processes personal data as long as necessary to fulfill the purposes set forth in previous paragraphs and in any case no longer than 24 months after the visitor accesses the Data Controller's premises.

## Means of the processing

Data processing is performed through paper media by persons specially appointed for the purpose highlighted above and committed to confidentiality.

## Data communication

the Company can eventually transmit some of visitors' personal data, according to a strict criterion of relevance, to the following categories of subjects:

- **third-party companies** (e.g., surveillance service providers, professional firms, etc.) that perform outsourced activities on behalf of the Data Controller;

- **supervisory bodies, law enforcement agencies or judiciary bodies** at their express request, who will process personal data as Autonomous Data Controller for institutional purposes.

Besides what has been previously stated, visitors' personal data will not be communicated or disseminated to unspecified third parties.

## Nature of data provision

The provision of data is mandatory and any refusal to provide it will result in the inability to access ISS premises.

## Data transfer

Visitors' personal data are not transmitted abroad.

## Exercise of data subject's rights

Any Visitor may, at any time, exercise the rights set forth below.

1. **Access to personal data:** to obtain confirmation that data are being processed and, if so, access to the following information: the purposes, the categories of data, the recipients, the retention period, the right to lodge a complaint with a Supervisory Authority, the right to request rectification or erasure or restriction of processing or opposition to the processing itself as well as the existence of an automated decision-making process;
2. **Request for rectification or erasure ("right to be forgotten"):** a data subject can request that the records containing his/her personal data, that ISS holds about him/her, are rectified if incorrect or deleted without undue delay in predetermined circumstances provided for in Art. 17 GDPR and 15 PDPL;
3. **Restriction of Processing:** data subjects' rights to obtain from the Data Controller a restriction to the use of personal data concerning them under specific circumstances detailed in Art. 18 GDPR and 16 PDPL;
4. **Objection to processing:** to object on grounds related to Visitors' data processing based on legitimate interest of ISS or automated decision making or profiling;
5. **Data Portability:** in the case of automated processing realized on the basis of consent or performing a contract, to receive in a structured, commonly used and machine-readable format the data concerning the visitor;
6. **Withdrawal of consent:** to the processing for the above-mentioned purposes; the exercise of this right does not affect in any way the lawfulness of the processing carried out before the withdrawal;
7. **Lodge a complaint:** under Article 77 GDPR and 24 PDPL with the Competent Supervisory Authority; for Italy, the competent authority is the *Garante Per La Protezione Dei Dati Personali*, which can be contacted through the contact details provided in the following website <http://www.garanteprivacy.it>.

Requests relating to the exercise of the data subjects' rights will be processed within one month from the initial request; in cases of particular complexity and relevant number of requests this term may be extended by further 2 (two) months.

## Points of contact for data subjects

Data subjects, for matters concerning the processing of personal data, can contact the Company at the following email address: [privacy@iss-gf.com](mailto:privacy@iss-gf.com) or ISS' Group Privacy Officer at the following email address: [GPO@iss-gf.com](mailto:GPO@iss-gf.com).

## Changes and updates

This Privacy Notice is effective from the date indicated in its header. The Company may also make changes and/or additions to this Notice, including as a consequence of any subsequent changes in the relevant applicable regulations.