



Author	Privacy department
Approval	Management

#### Revision version

Version	Author	Consultation of DPO	Issuance date	Reason for the revision
0.0	Privacy department	12/11/2021	12/11/2021	First issue
1.0	Privacy department	11/01/2022	11/01/2022	Indication of safety measures
2.0	Privacy department	06/06/2022	06/06/2022	Revision

<b>OPINION OF DPO</b> ok
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#### Zucchetti Axess Spa

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## ZSUPERVISOR

DATA PROCESSOR					
Name	Zucchetti Axess S.p.a.				
VAT no.	03537610960				
Address	Via Solferino, 1				
City	Lodi	Postal code	26900	Prov.	LO
Legal representative	Domenico Uggeri				
ORGANISATIONAL STRUCTURE					
Division	Security and automation	Product Manager	Silvia Prezioso		
PERSONS IN CHARGE OF PROCESSING					
Software support					
CONTACT DATA					
Data Processor	Zucchetti Spa	<a href="mailto:ufficio.privacy@zucchetti.it">ufficio.privacy@zucchetti.it</a>	03715941		
Representative of Data Processor	N/A				
Data protection officer (DPO)	Mario Brocca	<a href="mailto:dpo@zucchetti.it">dpo@zucchetti.it</a>	03715943191		
DESCRIPTION					
<p><b>ZSupervisor</b> is a supervisory software that integrates, in a unique interface and in real time, the collection and management of information coming from different systems, such as intrusion, fire, access control, audio, video, technological systems and so on.</p> <p>The platform allows real-time reception of alarms and data from connected devices, it analyses them and proposes event management procedures, thus enabling a timely verification of the report and a prompt solution.</p>					

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All operations and steps in the management of events are saved, so that periodic reports or intervention statistics can be made, thus ensuring the regular verification of issues and a much easier performance measurement of installed security solutions.

#### PURPOSE OF THE PROCESSING

Access control management, audio, video, technological installations following events reported by alarms such as anti-intrusion, fire-fighting; people and property security management. The purpose of the processing is to provide support and maintenance services to the Data Controller.

#### CATEGORY OF INTERESTED PERSONS

Customer (preselected operators), suppliers

#### CATEGORIES OF PERSONAL DATA

Personal Data: no personal data related to Master Data will be processed.

Special categories of personal data: personal data presenting specific risks will not be processed.

The software contains configuration data, such as the username, surname and name of the user, e-mail and password.

#### CATEGORY OF RECIPIENTS TO WHOM DATA CAN BE COMMUNICATED

Subcontractors/sub-suppliers, if the communication is necessary to fulfil contractual obligations for the purposes of application support and maintenance.

#### DATA TRANSFER ABROAD

No.

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## GENERAL DESCRIPTION OF THE TECHNICAL AND ORGANISATIONAL SAFETY MEASURES

### 1. TECHNICAL MEASURES THAT CAN BE IMPLEMENTED AT APPLICATION LEVEL

The security measures configurable in the application system are the following:

- ***Management of the login credentials***

- User name: the access to the system occurs only through the univocal identification of the accessing subject. The system is installed with an administrative credential the password of which must be changed at the first access after installation (by the Data Controller).  
The Data Controller may keep this general user “admin” and, in this case, s/he should prepare an organisational procedure in order for that user to be assigned to a single person in charge and to be managed according to the good management rules. As an alternative, the Data Controller can change the “admin” username by associating it with a specific person.  
Any other user can however, if necessary, be configured with an administrative profile.

- Autologoff: an auto-logoff function is provided, which can be set after N minutes of inactivity on the system
- Password: it is possible to set an expiration date for the password.
- Database password: during the installation, the SQL Server database is installed with an SA user and a default password. At the end of the installation, access is granted to the current Windows user as administrator and the SA user is disabled. For the operation of the software, a specific user is created with read-only and write-only permissions, the password being defined by the user. The password of the database user should be complex.

- ***Encryption techniques***

- The encryption of user passwords in the DB: a hash of the passwords is recorded using the Script algorithm.
- Database encryption: It is possible to encrypt the database by means of standard tools put at disposal by various DBEngine. Among the data present on the file system, there might be some passwords for the connection to the devices. These data have been saved in certain file drivers (DLL) which will be installed on the operating system and however encrypted by means of CryptoAPI. The access passwords to the DB are also saved on the server file system: even these ones are encrypted by means of CryptoAPI.

- ***Minimization:***

Authorisation profiles: the Data Controller can configure the access to the data processed in the system according to the activities carried out by the users.

- ***Privacy by default***

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Activation of user profile: upon the creation, the users do not have “rights”. The Data Controller is in charge to choose the appropriate user profile and assign the authorisations based on the user’s role, on the affiliation group or on the individual authorisation logics.

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## 2. DATA PROCESSOR: SECURITY MEASURES IMPLEMENTED FOR THE SUPPORT SERVICES

### ON SITE SUPPORT

Zucchetti operators access the customer's structure in order to carry out training or technical maintenance/support and installation activities.

In this case, they work as if they are part of the Customer's/Data controller's structure and they adopt all the procedures required by the Customer. The Customers/Data Controllers can generate individual user names for accessing their systems or they will provide access under supervision to Zucchetti appointees in order to train their staff.

If, during the support activity, Zucchetti appointees need to retrieve archives or databases in order to solve reported issues, they must inform the Customer/Data Controller and formalise, even by simply sending an e-mail, the information that they have retrieved the DB with the Customer's approval. At the end of the activity at the Zucchetti offices, the appointee who managed the intervention will delete the data; should it be necessary to store the data for a further period of time, a specific e-mail will have to be sent to the Customer/Data Controller with the following minimum content:

"Dear Customer, we inform you that the reported issue, which required the collection of your archives, was solved. We would like to inform you that we will store the archives from our information systems for the next X days (*to be defined from time to time as the need requires it*). At the end of the agreed period, the archives will be removed from the Zucchetti information systems and can no longer be restored"

### TELEPHONE SUPPORT

There are no issues as far as the personal data processing is concerned. There are no transmitted data or archives and the communication is only verbal. Generally, the first contact after the customer's request for support is always made in this way, in order to define the reported issue in detail.

### SUPPORT VIA E-MAIL/WEB TICKETS

In case of support via e-mail, always add the disclaimer in the message text:

"The content of this e-mail and of possible attachments is strictly confidential, it is not admissible in court and it is dedicated to the person/s to whom it is addressed. The content of the reply to this e-mail might also be known by other co-workers, who are part of the same homogenous group of the undersigned or part of other homogenous groups who are however related to the solution of the issue reported by you. If you add attachments containing personal data to the reply message, these will be saved in the ticketing tool and/or in the e-mail attachments and stored there for 3 years. If you received this e-mail by mistake, please notify us immediately and delete it from your computer. It is prohibited to copy and publish the content of this e-mail. Any abusive use of the information contained here, by third parties or by persons who are not indicated in this e-mail, can be prosecuted pursuant to the law. We hereby inform you that in order to exercise the rights

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provided by article 15 et seq. from the EU Regulation 2016/679 (GDPR), it is possible to refer to the following address: [ufficio.privacy@zucchetti.it](mailto:ufficio.privacy@zucchetti.it)".

Zucchetti appointees must never have the customer's access credentials sent by e-mail (only those used and in the possession of the customer, not those generated specifically for technicians who need to connect), nor must they save them on the ticketing tool and/or in e-mails.

If a customer/partner sends the access credentials for his/her environment without a request from Zucchetti appointees, it is necessary to reply them that we are not authorised to access the systems with other users' credentials because this method infringes the EU Regulation 2016/679 (GDPR). Therefore, Zucchetti appointees will have to request individual credentials or the connection with TeamViewer (or an equivalent tool).

Every e-mail must be signed with the first and last name of the operator who handled the Customer's issue and the information must be saved in the ticketing tool and/or in the e-mail.

Clarifications:

The disclaimer can also be added in the web tickets.

Personal e-mail addresses should not be used, as they cannot be controlled.

#### SUPPORT BY IMPORTING CUSTOMERS' DATABASE

If, in order to solve the issue reported by the Customer/Data Controller, it is necessary to have the database or other files or queries containing personal data transmitted, the Customer must be informed of this necessity. If the customer is not able to make the copy himself/herself and asks Zucchetti appointees to do so, it is necessary to receive his/her authorisation also for the VPN connection (to be saved in the ticketing tool and/or in the e-mail).

In order to carry out this activity, it is necessary to send the customer/Data Controller an e-mail with the following content:

"Dear Customer,

in order to solve the issue reported by you, it is necessary to check your archives.

We ask you to authorise us to connect via VPN to take copies and to process them in order to solve what has been reported".

The archives will be stored for the time strictly necessary to solve the reported issue and will be deleted by Zucchetti appointees at the end of the intervention.

Data must be saved in the Directory and they should not be subject to backup".

If there is the need to store the archives, it is necessary to send an e-mail to the customer, as described below:

"Dear Customer,

having solved the issues on the archives that you sent, we request the authorisation to store your archives on our infrastructure for the next \_\_\_\_ days. The purpose of this storage is to check for possible issues that you may report during the use of the restored archives. At the end of the above-mentioned period, we will proceed to the permanent removal of the archives. If after this period your archives are needed, we will request them again.

To this end, we request an express confirmation by replying to this message. If your reply is negative, we will proceed to the immediate deletion of your archives".

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The customers' archives cannot be transmitted to work groups other than those in charge with solving the issue reported by the customer.

The only possibility to store the archives without the prior authorisation of the customer is to make them anonymous.

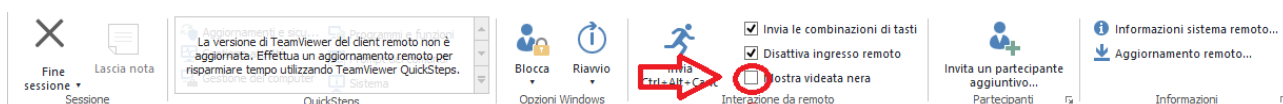
### SUPPORT VIA REMOTE TEAMVIEWER CONNECTION

This method of connection to the customers' tools ensures privacy because:

- The connection is always requested by the customer
- The access credentials are always individual
- The customer grants us access to an environment with an authorisation profile chosen by him/her in order for us to perform support activities
- The customer can disconnect us whenever s/he wishes

Via TeamViewer, it is also possible to grant access for the second level support to the same session opened by us. In this case, the customer has the evidence as it has been supplied by the tool and therefore s/he implicitly accepts this method.

If there are codes, passwords or licenses that we must add for the proper operation of the tool and which the customer is not meant to see, it is essential to use the TeamViewer function: Show black screen



It is essential to use our TeamViewer as it is licensed and customised with the entire documentation required by the law on personal data processing.

Only in exceptional cases and after a careful assessment performed by the manager and by the privacy office, it is possible to use other connection tools that operate in the same way.

### SUPPORT VIA VPN CONNECTION

If the support activity must be performed via VPN or private accesses, Zucchetti operators must enter the customers' systems:

- With the customer's prior authorisation
- With the credentials that must be active for the time frame needed for the execution of the requested activities
- The credentials must be disabled at the end of the activity by the Customer/Data Controller

The creation of a user name must only be requested from the customer, who must generate it individually for every Zucchetti appointee.

It is necessary to send an e-mail to the customer:

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“In order to carry out the support activities you have requested, it is necessary to create individual access profiles for the operators who will perform those activities. To this end, it is necessary to generate those access credentials to the system.”

When the customer makes the request, after the individual user name has been created:

“In order to carry out the support activities you have requested, it is necessary to enable the user name associated to me”

At the end:

“The support activity is completed. We remind you to disable the credentials in order to protect your personal data”.

#### OTHER TYPES OF SUPPORT

The support is also performed on video surveillance systems. When a video camera does not work or it is necessary to check its functioning, if it is integrated within ZSupervisor, the intervention is made on ZSupervisor; in these cases, access is granted to the configuration settings or images, but for a time strictly limited to the need for intervention/support.

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