

VIDEO SURVEILLANCE PRIVACY POLICY

We hereby inform you that your personal data will be processed in compliance with the legislation on the protection of personal data (EU Regulation 2016/679, the “GDPR”), and Legislative Decree no. 196/2003 and subsequent amendments (the “Privacy Code”).

1. DATA CONTROLLER

The Data Controller is Università Commerciale “Luigi Bocconi”, with registered offices at Via Sarfatti 25, Milano (MI).

2. DATA PROTECTION OFFICER

Bocconi has appointed a Data Protection Officer (hereinafter "DPO"), who can be contacted at the following email address: dpo@unibocconi.it

3. PROCESSING OF PERSONAL DATA

PURPOSE OF PROCESSING	LEGAL BASIS	PERSONAL DATA PROCESSED	STORAGE PERIOD
<ul style="list-style-type: none"> to ensure the safety and security of university staff, students and visitors entering the University buildings; to guarantee the integrity of the University's assets; to prosecute unlawful conduct; to comply with the investigative needs of the Authorities or Police. 	<ul style="list-style-type: none"> legitimate interest of the Data Controller (Article 6 paragraph 1, letter f) of the GDPR). 	<ul style="list-style-type: none"> images and videos taken by video cameras 	7 days

4. COMMUNICATION OF PERSONAL DATA



In pursuance of the abovementioned aims, your personal data may be communicated to:

- a) internal departments at the University. Personal data will be processed by authorized personnel, pursuant to Article 29 of the GDPR and Article 2-*quaterdecies* of the Privacy Code.
- b) third-party companies appointed as Data Processors, pursuant to Article 28 of the GDPR. In detail, the companies that have been appointed are:
 - Fidelitas S.p.A.,
 - Elettro Impianti S.r.l.
 - SMAU-GFI S.r.l.
 - Corindus Service S.r.l.
 - CLS S.p.a
 - SG2 S.r.l. Unipersonale
 - National Services Group S.r.l.
 - Il Poliedro Cooperativa di Servizi
- c) Your data may be disclosed to:
 - Authorities and law enforcement

In any case, the Data Subject may request further information by writing to the DPO, at the addresses indicated in point 2.

5. DATA PROCESSING METHODS

The video surveillance system consists of a network of cameras connected to the University's intranet network, which provide images to the central physical access control station. The images can be examined remotely by authorized persons during non-office hours or on public holidays if alarms have been reported for intrusion, fire or other reasons. Some cameras allow video recording even in low light at night. The images will be visible at the central access control station at the University/on campus in the Control Room, located at Via Sarfatti no. 25, first floor.

The images are stored for a maximum of 7 (seven) days following detection, after which the system will automatically over-record the new images detected, except in the case of special needs of further storage in relation to holidays or periods of office closures, as well as in the event of needing to respond to a specific investigative request of the Judicial Authority or law enforcement.

The personal data contained in the aforementioned automated information systems, as well as those kept in the Data Controller's archives, are processed in accordance with the provisions of national legislation on the protection of natural persons with regard to the processing of personal data and the GDPR on security measures, in order to minimize the risks of destruction or loss, unauthorized access or processing that does not comply with the purposes of collection.

Cameras currently installed do not record sound and are fixed in one position.

Taking into account the position and field of action of the cameras, the video surveillance system does not allow work performance to be controlled.

In any case, the Data Subject may request further information by writing to the DPO, at the addresses indicated in point 2.

6. TRANSFER OF DATA OUTSIDE THE EU

Some processing carried out by the University – for the purposes listed above – provides for the transfer of personal data outside the European Union. The transfer of personal data to third parties residing or located in States that do not belong to the European Union and that do not ensure adequate levels of protection will only be carried out after the conclusion between the University and said subjects of specific agreements, containing safeguard clauses and appropriate guarantees for the protection of personal data – Standard Contractual Clauses – approved by the European Commission, as provided for by Chapter V, Articles 44 et seq. of the GDPR, as well as in compliance with the provisions of the European Court of Justice and national and foreign authorities on the protection of personal data.

In any case, the Data Subject may request further information by writing to the DPO, at the addresses indicated in point 2.

7. RIGHTS OF THE DATA SUBJECT

You have the right at any time to exercise the rights recognized by law, pursuant to Articles 15-22 of the GDPR. In particular, as a Data Subject, you have the right to:

- a. confirmation whether or not personal data concerning you is being processed and access to the data and the following information: processing purposes, categories of personal data, recipients and/or categories of recipients, storage period);
- b. correction of inaccurate personal data and/or the integration of incomplete personal data, also by providing a supplementary statement;
- c. cancellation, in the cases provided for by the GDPR;
- d. limitations on the processing in the cases provided for by current privacy legislation;
- e. the portability of the data and in particular the possibility of requesting the direct transmission of the personal data processed to another Data Controller;
- f. withdrawal of any consent given, without affecting the lawfulness of the processing based on consent prior to withdrawal;
- g. opposition, at any time, to the processing, pursuant to Article 21 of the GDPR.

Without prejudice to any other administrative or judicial appeal, you also have the right to lodge a complaint (Article 77 GDPR) with the Italian Data Protection Authority (www.garanteprivacy.it), if you believe that the processing that concerns you violates the current legislation on protection of personal data.

To exercise all the rights indicated above, you may contact the Data Controller or the DPO in writing at the addresses indicated above.