

# **PRIVACY POLICY**

VIDEO SURVEILLANCE



We inform you that your personal data will be processed in compliance with the legislation on the protection of personal data (EU Regulation 2016/679, "GDPR"), and D. Legislative Decree 196/2003 and ss.mm.ii. ("Privacy Code").

#### 1. Data controller

The Data Controller is the Università Commerciale "Luigi Bocconi", with registered office in Via Sarfatti 25, 20100 Milano (MI).

#### 2. Data Protection Officer

Bocconi has appointed a *Data Protection Officer* (hereinafter "DPO") who can be reached at the following mailbox: <a href="mailto:dpo@unibocconi.it">dpo@unibocconi.it</a>

## 3. Processing of personal data

PURPOSE OF PROCESSING	LEGAL BASIS	PERSONAL DATA PROCESSED	RETENTION PERIOD
<ul> <li>ensure the safety and security of university staff, students and visitors accessing university buildings;</li> <li>ensure the integrity of the University's assets;</li> <li>prosecuting unlawful conduct;</li> <li>comply with the investigative needs of the Authority or Police Forces.</li> </ul>	Pursuit of the legitimate interest of the data controller (Art. 6(1)(f) GDPR)	• images and videos taken by the cameras	7 days

#### 4. Disclosure of personal data

For the pursuit of the above-mentioned purposes, the personal data collected may be communicated to

- a) internal units within the University. Personal data will be processed by authorised 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.
- c) The data may also be communicated to
  - Authorities and police forces

In any event, the data subject may request further information by writing to the DPO at the addresses indicated in section 2.



### 5. Processing Methods

The video surveillance system consists of a network of cameras, connected with the University's *intranet*, which provide images to the central physical access control station. The images can be examined remotely, by authorised persons, during off-duty hours of staff or on public holidays, if alarms have been reported for intrusion, fire or other reasons. Some cameras allow video footage even in poor lighting at night. The images will be visible at the central *University/Campus* access control station in the *Control Room*, located at Via Sarfatti no. 25, first floor.

The images are retained 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 requirements for further retention in connection with holidays or periods when offices are closed, as well as in the event of a specific investigative request by the judicial authorities or the Police Force.

The personal data contained in the aforementioned automated information systems, as well as those stored in the Data Controller's archives, are processed in accordance with the provisions of national legislation on the protection of individuals with regard to the processing of personal data and the GDPR on security measures, so as to minimise the risks of destruction or loss, unauthorised access or processing that is not in accordance with the purposes of collection.

The currently installed cameras do not record sound and are stationary

Given the location and range of the cameras, the video surveillance system does not allow monitoring of work performance.

In any event, the data subject may request further information by writing to the DPO at the addresses indicated in section 2.

#### 6. Data transfer outside the EU

Some processing operations carried out by the University, for the purposes listed above, involve the transfer of personal data outside the European Union. The transfer of personal data to third parties resident or located in countries that do not belong to the European Union and that do not ensure adequate levels of protection will only be carried out after specific agreements have been concluded between the University and said parties, containing appropriate safeguard clauses and 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 adopted by the European Court of Justice and by national and foreign Authorities on the protection of personal data.

In any event, the data subject may request further information by writing to the DPO, at the addresses listed under point 2.

# 7. The rights of the data subject

You have the right to exercise the rights recognised by the legislation at any time, pursuant to Articles 15-22 of the GDPR. In particular, as a data subject, you have the right to obtain:

 a. confirmation as to whether or not personal data are being processed and access to the data and the following information: purpose of processing, categories of personal data, recipients and/or categories of recipients, storage period;



- b. rectification of inaccurate personal data and/or supplementation of incomplete data, including by providing a supplementary declaration;
- c. erasure, in the cases provided for by the GDPR;
- d. the restriction of processing in the cases provided for by the privacy legislation in force;
- e. data portability and, in particular, the possibility of requesting the direct transmission of processed personal data to another data controller;
- f. revocation of any consent given, without prejudice to the lawfulness of the processing based on the consent before revocation;
- g. opposition, at any time, to the processing, pursuant to Article 21 of the GDPR.

Without prejudice to any other administrative or jurisdictional recourse, you also have the right to lodge a complaint (Art. 77 GDPR) with the Privacy Guarantor (www.garanteprivacy.it), if you consider that the processing concerning you violates the regulations in force on the protection of personal data.

In order to exercise all the above-mentioned rights, you may contact the Controller or the DPO in writing at the above-mentioned addresses.

[] I declare that I have read and understood the information on the processing of my personal data

