



# IUSS

Scuola Universitaria Superiore Pavia

## **INFORMATION ON THE PROCESSING OF PERSONAL DATA ACQUIRED THROUGH VIDEO SURVEILLANCE SYSTEMS INSTALLED AT IUSS SCHOOL PREMISES (pursuant to EU Regulation 2016/679)**

Pursuant to Article 13 of the EU Regulation 2016/679 ("GDPR") on the protection of individuals with regard to the processing of personal data and on the free movement of such data, IUSS School informs data subjects regarding the methods of collection and processing of personal data acquired through the video surveillance systems installed at its premises.

### **Data Controller and Data Protection Officer (DPO)**

Data controller is IUSS School represented by the Rector (headquarter Piazza della Vittoria n. 15, 27100 Pavia – PEC [diram@pec-iusspavia.it](mailto:diram@pec-iusspavia.it)).

IUSS School has appointed a Data Protection Officer (headquarter Piazza della Vittoria n. 15, 27100 Pavia – Tel. 0382375876 – email: [dpo@iusspavia.it](mailto:dpo@iusspavia.it) – PEC [diram@pec-iusspavia.it](mailto:diram@pec-iusspavia.it)).

### **Purpose for processing and legal basis**

The IUSS School collects and processes personal data for the pursuit of its institutional aims. The processing of personal data collected by video surveillance systems is aimed exclusively at:

- promoting the safety and security of university staff, students and visitors on university premises and in university spaces;
- safeguarding the University's movable and immovable property;
- preventing acts of vandalism when other suitable instruments are unavailable.

This processing is carried out in accordance with Article 6(c) of the GDPR ("processing is necessary for compliance with a legal obligation to which the controller is subject") for the following purposes:

- a) ensuring the safety and security of the university community (students and staff), as well as those who use university premises for various activities;
- b) protecting the university's assets, both movable and immovable.

Pursuant to Article 4 of Law 300/1970 (Workers' Statute), the systems employed are not used to remotely monitor the work activities of employees or others performing work on behalf of the University. Cameras are not positioned to film workstations, attendance recorders or communal refreshment areas, nor are they placed in a manner that infringes upon the fundamental rights and freedoms of individuals.

The collection of data does not involve the activation of an automated decision-making process (including profiling).

### **Categories of data**

The processing is carried out by the IUSS School and relates to images of people passing through the range of action of such systems.



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Personal data will NOT be processed for commercial or marketing purposes or transferred to third parties.

## **Treatment methods**

Data are collected in accordance with the principles of relevance, completeness, and non-excessiveness in relation to the purposes for which they are processed. The personal data provided are processed in compliance with the principles of lawfulness, fairness and transparency, provided for in Article 5 of the GDPR, with the aid of computer and telematic tools suitable for storing and managing the data themselves and, in any case, in such a way as to guarantee their security and protect the utmost confidentiality of the data subject. The data may possibly also be processed by means of paper media. In any case, the data will be processed in accordance with the provisions of Article 32 of the GDPR to prevent data loss, illicit or incorrect use and unauthorized access and in accordance with the provisions of AgID Circular No. 2/2017 "Minimum ICT security measures for public administrations".

The interested parties are informed in advance that they are about to access an area subject to video surveillance; since it is strictly instrumental to accessing such areas, the provision of the data is mandatory.

## **Communication, dissemination and transfer of data**

Personal data will be processed, in compliance with the relevant legislation in force, exclusively by the staff of this School, adequately trained and authorised to process personal data, according to the functions deriving from the organisation chart. Data may also be processed by service providers expressly appointed as external data processors (pursuant to Article 28 of the GDPR). In some cases, the images may only be recorded, in others they may also be collected by appropriately authorised and trained personnel.

The data may be disclosed to the administrative authorities to which it must be transmitted in accordance with the law.

Personal data may be communicated to the company CIVIS SpA - Centro Italiano di Vigilanza Interna e Stradale, with which the IUSS School has contractually assigned control of the images recorded by the video surveillance system in the event of alarm activation.

Finally, the personal data of the data subjects will not be transferred to non-EU third countries or international organisations.

The images will not be used for profiling activities

## **Data retention**

Recorded images are retained exclusively for the time necessary to achieve the purposes pursued and, in any case, for a period no longer than 72 hours, except in the case of specific requests by legitimate public subjects and in the case of planned and prolonged periods of



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closure of the University and, in any case, no longer than a week. Once this period has expired, the images are deleted.

## **Rights of the Data Subject**

Data subjects have the right to request from the data controller access to and rectification or erasure of personal data or restriction of processing concerning them, or to object to processing (Articles 15 et seq. of EU Regulation 679/2016). The appropriate application is submitted by writing to Scuola Universitaria Superiore IUSS - Piazza della Vittoria n. 15, 27100 Pavia – PEC [diram@pec-iusspavia.it](mailto:diram@pec-iusspavia.it). The application may also be submitted through the Data Protection Officer, at [dpo@iusspavia.it](mailto:dpo@iusspavia.it)

Data subjects who believe that the processing of personal data relating to them occurs in violation of the provisions of the GDPR have the right to lodge a complaint with the Guarantor as provided for in Article 77 of the GDPR or to take appropriate legal action pursuant to Article 79 of the GDPR.

No automated processes, including profiling as referred to in Article 22(1) and (4) of the GDPR, will be adopted.