



VIDEO SHOOTING ON THE OCCASION OF EVENTS ORGANIZED IN THE UNIVERSITY

Policy for the processing of personal data collected from the person concerned art. 13 of EU Reg. 2016/679 – GDPR

1. DATA PROCESSORS

The **DATA CONTROLLER** pursuant to articles 4 and 24 of EU Reg. 2016/679 is the International University of languages and Media IULM, with headquarters in Via Carlo Bo 1 - 20143 Milan, in the person of its pro-tempore legal representative.

The University, in accordance with art. 37-39 Reg. UE 2016/679, appointed **Data Protection Officer**, who can be contacted at the following email address: dpo.iulm@dpoprofessionalservice.it.

2. PURPOSES AND LAWFULNESS OF THE PROCESSING

Personal data will be processed, in accordance with conditions for the lawfulness of processing pursuant to art. 6 lett. f) of Regulation (EU) 2016/679, for promotional purposes of Data Controller, including through the dissemination of images on IULM's institutional websites, social networks and other channels (eg brochures, flyers, etc.). In accordance with Recital 47 of the GDPR, the Data Controller has carefully carried out an assessment relating to the balancing of their interests (promotional and dissemination purposes of the event during which the images, photos and videos are made) and the fundamental rights and freedoms of the subjects participating in the event and subjected to processing activities (students, visitors, journalists, business partners, etc.) taking into account the relationships between Data Subjects and Data Controller. The latter informs in advance, by means of a cartoon displayed and available for consultation at the event, of the video and photo shooting activities and their possible dissemination through IULM institutional websites, social networks and other channels (e.g. brochures, flyers etc.) and provides Data Subjects with the possibility of immediately opposing the processing of their images at the event location, or after it, by contacting the University Events Office by writing to eventi@iulm.it. In light of the balancing of interests carried out, the media and commercial relevance of the event and taking into account the information measures adopted by the Data Controller, it is believed that anyone participating in the event can reasonably expect to be, even if only incidentally, the subject of video and photo shooting, and that these images can also be disseminated through the means of communication (websites and social networks) of the Data Controller.

3. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA

Personal data provided by you may be communicated to recipients, appointed pursuant to art. 28 of the Regulation EU 2016/679, which shall process your data as processors and/or persons acting under the authority of the Controller and the Processor, in order to perform agreements or related purposes. Precisely, your data may be communicated to recipients part of the following categories:

- management services providers of IT systems and communication networks of IULM University (including emails and IULM web platform);
- authorized University staff;
- competent Authorities for the fulfillment of obligations of law, if required.

The subjects belonging to the aforesaid categories act as data Processors or act in complete autonomy as separate data Controllers. The list of designated data Processors is constantly updated and available at the offices of IULM University.

4. DATA TRANSFER TO A THIRD COUNTRY AND/OR INTERNATIONAL ORGANISATION

Personal data will not be transferred abroad within or outside the European Union.

5. DATA RETENTION PERIOD OR RELEVANT CRITERIA

The processing shall be carried out in automated and / or manual manner, with methods and tools aimed at ensuring the best security and confidentiality, by persons specifically appointed to do so.

Pursuant to the provisions of art. 5 par. 1 letter e) of Regulation (EU) 2016/679, your personal data (images taken during events) will be archived and kept indefinitely for reasons of historical interest and may be used for promotional purposes for a maximum period of 2 years.



6. NATURE OF DATA PROVISION AND REFUSAL

The provision of your personal data for the purposes referred to in point 2 of this information document is optional. Your refusal to provide data makes it impossible for the Data Controller to use your image collected during the event for the intended purposes.

In the case you intend to oppose the processing of your image, please inform the Data Controller immediately by notifying the University representatives present at the event or by contacting the contact details indicated in point 7 of this information notice.

7. DATA SUBJECT'S RIGHTS

You may exercise your rights pursuant to articles 15, 16, 17, 18, 19, 20, 21, 22 of the Regulation EU 2016/679, by contacting the data Controller, or the data Processor, or the Data Protection Officer service by writing to privacy@iulm.it.

You have the right, at any time, to request the data Controller to access, rectify, cancel your personal data or limit their processing. Furthermore, you have the right to object, at any time, to the processing of your data (including automated processing, e.g. profiling).

Without prejudice to any other administrative and judicial appeal, if you believe that the processing of your data violates the provisions of Regulation EU 2016/679, pursuant to art. 15 letter f) of the aforementioned Regulation EU 2016/679, you have the right to lodge a complaint with the Data Protection Authority and, with reference to art. 6 paragraph 1, letter a) and art. 9 paragraph 2, letter a), you have the right to withdraw the consent given at any time.

Updating date on: 28 October 2019