



## **Information on the processing of personal data through video surveillance systems**

Regulation (EU) 2016/679, the “General Data Protection Regulation” (hereinafter, GDPR), provides that everyone has the right to the protection of personal data concerning him or her.

In compliance with Article 13 of GDPR the University of Trento provides to those who access University structures subject to video surveillance systems (hereinafter “Data subjects”) with the following information.

### **1. Data Controller**

The Data Controller is the **University of Trento**, via Calepina n. 14, 38122 Trento (TN).

The Data Controller can be reached at the following email addresses: [ateneo@unitn.it](mailto:ateneo@unitn.it), [ateneo@pec.unitn.it](mailto:ateneo@pec.unitn.it)

### **2. Contact details of the Data Protection Officer**

The Data Protection Officer can be contacted to request information on personal data at the following email address: [rpd@unitn.it](mailto:rpd@unitn.it)

### **3. Purpose of the processing and legal basis**

The University of Trento processes personal data according to the Decision by the Italian Data Protection Authority on video surveillance dated 8 April 2010 and the EDPB Guidelines 3/2019 on processing of personal data through video devices, as part of the performance of its public interest tasks as well as to comply with a legal obligation to which the Data controller is subject (Article 6, paragraph 1, letters e) and c) of the GDPR ) and, in particular, for the following purposes:

- to ensure the **protection of the University's property and real estate heritage;**
- to ensure the **safety and security** of students, university staff (teaching and technical-administrative personnel) pursuant to Legislative decree 81/2008 as amended and Article 2087 of the Italian Civil Code, and as well as of visitors pursuant to Articles 2043 and 2051 of the Italian Civil Code.

In compliance with Article 4 of Law No. 300/1970 (Workers' Statute), the video surveillance systems are not in any way used as a tool for remote control of the work activities of university staff and of all those who work in various roles at the University.

### **4. Categories of processed data**

Personal data: images of the Data subjects.

### **5. Nature of the provision of data**

The provision of data is necessary for the access to the University's buildings and areas subject to video surveillance. The failure to provide the data will result in the impossibility of accessing these buildings.



## **6. Data processing methods**

Video recordings are made 24/7 through a system of permanent video equipment, which does not record audio. The areas concerned cover the main access points to the buildings, common areas, surrounding areas and car parking areas.

The recorded images shall be processed by the authorised staff, according to their tasks and in compliance with the principles of lawfulness, correctness, transparency, adequacy, relevance, accuracy, non-excess, integrity and confidentiality (GDPR, Article 5(1)) and data protection by design and protection by default (GDPR, Article 25)). Recorded images are stored in protected areas that are not accessible to unauthorised third parties.

No automated decision-making processes, including profiling, are carried out.

## **7. Categories of recipients of personal data**

In addition to all the University personnel acting for the above mentioned purposes, personal data will be disclosed to third parties (public and private) in order to fulfil the mentioned purposes, including the right of judicial defence of the University of Trento. While providing services necessary to the fulfilment of the above mentioned purposes, any body/entity processing personal data on behalf of the University will be appointed as Data Processor as per article 28 of GDPR.

In any case images may be disclosed to the Judicial Authorities and/or Police bodies according to specific orders for the purpose of preventing, investigating or prosecuting crimes.

## **8. Transfer to non-EU countries**

Personal data will not be transferred to countries outside the European Economic Area.

## **9. Data retention period**

The images are stored for a maximum period of 72 hours taking into account holidays, weekends and other periods when the university buildings are closed. After that period, they are automatically deleted.

This is without prejudice to special further storage requirements related to specific investigative orders by Judicial Authorities or Police bodies for the purpose of preventing, investigating or prosecuting crimes.

## **10. Rights of the data subjects**

At any time, Data subjects shall exercise the rights referred to by Article 15 et seq. of the GDPR against the Data Controller at the above-mentioned email addresses.

In particular Data subjects have the right to obtain from the Data Controller:

- **access to personal data** and other information pursuant to article 15 of the GDPR;



- **rectification of personal data** when inaccurate and/or their **integration** when incomplete;
- **erasure of personal data** except when the University is obliged to data storage pursuant to article 17 par. 3 of the GDPR;
- **restriction of processing** as per art. 18 of the GDPR;
- **opposition to the data processing operation** according to art. 21 of the GDPR.

To exercise your rights, you can also use the form available on the "[Privacy and protection of personal data](#)" page of the University website.

In case there is an infringement of the GDPR on the processing of personal data, Data subjects have the right to lodge a complaint with the Italian Data Protection Authority by virtue of article 77 of the GDPR or to engage in legal proceedings.

*Last update on April 4, 2023*