

# PRIVACY POLICY - VIDEO SURVEILLANCE SYSTEM Information document pursuant to and in accordance with Article 13 of Regulation (EU) 2016/679 (GDPR)



In compliance with the provisions of Article 13 of the EU Regulation 2016/679, the Provision on Video Surveillance - April 8, 2010 of the Privacy Authority and the Guidelines 3/2019 of the European Data Protection Board (EDPB), we are to provide the necessary information regarding the processing of personal data carried out through the video surveillance system.

### 1. DATA CONTROLLER AND CONTACTS

The Data Controller is the **University of Parma**, located in via Università 12, 43121 Parma (PR), Italy, in the person of its pro-tempore Legal Representative, who can be contacted for any information by: phone: +39 0521 902111, e-mail: protocollo@unipr.it, pec: protocollo@pec.unipr.it



## DATA PROTECTION OFFICER AND CONTACTS

The **University of Parma** has appointed its Data Protection Officer (DPO) pursuant to Articles 37, 38 and 39 of the GDPR. The DPO can be reached at the Controller's office listed above and via e-mail by writing to: e-mail: dpo@unipr.it, pec: dpo@pec.unipr.it



### 2.MAIN DEFINITIONS

Please note that Article 4 of the GDPR provides the following definitions:

- **Personal data means** any information relating to an identified or identifiable natural person ("**data subject**"); an identifiable person is one who can be identified, directly or indirectly, by reference in particular to an identifier such as a name, an identification number, location data, an online identifier, or to one or more features of his or her physical, physiological, genetic, mental, economic, cultural or social identity.

# 3. PURPOSE OF PROCESSING, LEGAL BASIS, STORAGE PERIOD, NATURE OF CONFERMENT

	PURPOSE OF PROCESSING	LEGA L BASIS.	DATA RETENTION PERIOD	NATURE OF CONTRIBUTION
A)	Personal data will be processed in compliance with the conditions of lawfulness under Art. 6 EU Reg. 2016/679 for the purpose of security and protection of company assets and individuals.  The University of Parma provides for the detection/recording of images by means of closed circuit video surveillance systems, to be used also as a means of evidence pursuant to the regulations in force, in order to enable the protection of persons and corporate assets with respect to possible aggression, theft, robbery damage, vandalism and in any case for any malicious or culpable action or event that may cause harm, actual or potential, to the human resources and tangible and intangible assets of the University, as well as for the purposes of fire prevention or safety of the workplace and related external areas.	Processing is necessary for the pursuit of the legitimate interests of the data controller or a third party, provided that the interests or fundamental rights and freedoms of the data subject requiring the protection of personal data do not prevail (C47-C50).  Art. 6 par. 1(f) GDPR.	In compliance with the provisions of Article 5 paragraph 1 letter e) of EU Reg. 2016/679, the personal data collected will be stored in a form that allows the identification of data subjects for a period of time not exceeding the achievement of the purposes.  Images are retained for up to 7 days after capture as allowed by the Data Protection Authority's note personal Prot. Athenaeum No. 40670 of 13	The provision of data is necessary, as it is strictly instrumental for access to the University's facilities.  Failure to provide it will make it impossible for the owner to give it access.



	PURPOSE OF PROCESSING	LEGAL BASIS.	DATA RETENTION PERIOD	NATURE OF CONTRIBUTION
			December 2010 with the subject "Retention periods of images collected through a video surveillance system" (Ref. Art. 6 paragraph 3 of the Video Surveillance System Regulations), except for any investigative requests by law enforcement agencies and/or the Public Prosecutor's Office, which may result in an extension of this period. After these terms have expired, the images are automatically deleted.	
В)	Prevention and conduct of litigation and other legal issues. Defense in litigation cases.	Processing is necessary for the pursuit of the legitimate interest of the data controller or a third party, provided that the interests or fundamental rights and freedoms of the data subject requiring the protection of personal data do not prevail (C47-C50).  Art. 6 par. 1(f) GDPR.	For the time necessary for the defense in court, unless opposed	The provision of data is necessary. Failure to provide it will prevent the achievement of the interest legitimate of the Owner stated in the purposes of this section. The denial will have to be balanced against the legitimate interest of the Holder stated in the purposes of this section.



# 4. RECIPIENTS OF THE DATA

Personal data will be disclosed to entities that will process the data as autonomous Data Controllers, or Data Processors (Art. 28 GDPR) and processed by individuals (Art. 29 GDPR) acting under the authority of the Data Controller and Data Processors on the basis of specific instructions given regarding the purposes and methods of processing. The data will be communicated to recipients belonging to the following categories:

- public official and/or judicial authority if requested;
- Designated parties for the management/ maintenance/ administration of the video surveillance system, based in Italy. It is specified that the University has appointed a person to manage the facility, namely the Head of the Vigilance and Logistics Organizational Unit, who can be reached, for any inquiries, by writing to .vigilanzaelogistica@unipr.it

The list of Art. 28 Data Processors is available by writing to <a href="mailto:protocollo@unipr.it">protocollo@unipr.it</a> or the other contact details above.





## 5. TRANSFER OF DATA TO COUNTRIES OUTSIDE SEE

Personal data will not be transferred to countries outside the EEA. It should be noted, in particular, that the data will be stored in Italy and that the recipients of the data are based in Italy.



### **6. AUTOMATED PROCESSES**

Personal data will be subject to traditional manual, electronic and automated processing. It should be noted that fully automated decision-making processes are not carried out.



## 7. RIGHTS OF INTERESTED PARTIES

Data subjects may assert their rights as expressed in Art. 15 et seq. GDPR, by contacting the DPO/RPD at e-mail:dpo@unipr.it or by contacting the Data Controller, writing to: vigilanzaelogistica@unipr.it, copying: protocollo@unipr.it, or by writing to the above contacts.

The data controller guarantees data subjects the possibility of requesting, at any time, access to their personal data (art.15), rectification (art.16), deletion of the same (art.17), and restriction of processing (art.18). The data controller shall communicate (art. 19), to each of the recipients to whom the personal data have been transmitted, any rectification or erasure or restriction of processing carried out. The data controller shall communicate to data subjects who request such recipients. In the cases provided for by the GDPR (art.21), it is recognized that data subjects have the right to object, at any time, to the processing of data based on legitimate interest, by writing to the contacts above with the subject "opposition."

In the event that data subjects believe that the processing of personal data carried out by the Data Controller is in violation of the provisions of Regulation (EU) 2016/679, they are free to file a complaint with the Supervisory Authority, particularly in the member state where they usually reside or work, or in the place where the alleged violation of the regulation occurred (Privacy Guarantor https://www.garanteprivacy.it/), or to take appropriate legal action.



## 8. INFORMATIONAL CHANGES

The owner may change, modify, add or remove any part of this Notice. In order to facilitate verification of any changes, the Notice will contain an indication of the date the Notice was updated.

Update Date: MAY 2025

The Data Controller **University of Parma**