



## **VIDEO SURVEILLANCE NOTICE PURSUANT TO REGULATION (EU) 679/2016**

This information notice is issued in accordance with Article 13 of Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and in compliance with the law on the processing of personal data and the free movement of such data 08 April 2010, as well as in accordance with the General Measure in video surveillance issued by the Italian Data Protection Authority on 8 April 2020.

This information notice **concerns the system of facilities operated by Infrastructures, Estates and General Services of Politecnico di Milano (AGIS)** and supplements the simplified information notice provided through the signs displayed at the cameras.

### **Data Controller**

Politecnico di Milano - General Director delegated by the pro-tempore Rector - contact: [dirgen@polimi.it](mailto:dirgen@polimi.it).

### **Internal Data Processor**

Mr. Francesco Cavazzana - Head of Infrastructures, Estates and general Services (AGIS)  
E-mail: [francesco.cavazzana@polimi.it](mailto:francesco.cavazzana@polimi.it)

The data shall be processed by other persons authorised and instructed for this purpose in accordance with current legislation.

### **Data Protection Officer and contact details**

Email: [privacy@polimi.it](mailto:privacy@polimi.it)

### **Purpose of data processing, legal basis, categories of data and retention period.**

For the purposes of applying the relevant European and national legislation (Regulation (EU) 679/2016, hereinafter 'Regulation'), we hereby inform you that your personal data shall be used for the following purposes:

<b>Intended purpose of the personal data processing</b>	<b>Legal basis of the processing</b>	<b>Categories of personal data subject to processing</b>	<b>Retention period of personal data</b>
<b>Purpose 1</b> Protection of the University's assets from vandalism, damage and theft.	Public interest (Article 6, paragraph 1 e) of the EU Regulation.	<ul style="list-style-type: none"><li>• Video streams</li></ul>	The data collected will be kept for 72 hours, except additional retention during the University's closed periods or at the request of the Judicial Authority or the



<b>Purpose 2</b> Promote the safety and physical security of University staff, students and visitors entitled, for various reasons, to access University premises.	Public interest (Article 6, paragraph 1 e) of the EU Regulation.		Judicial Police. Only in the event of suspected or evident damage or offence, the images extracted at the express request of the complainant may be retained for a maximum of 15 natural and consecutive days while waiting for the prosecuting authority to request them.
<b>Purpose 3</b> Preventing and detecting illicit and unauthorised access to the University's premises (high-risk locations, IT infrastructures, etc.).	Public interest (Article 6, paragraph 1 e) of the EU Regulation.		
<b>Purpose 4</b> Allowing judicial or law enforcement authorities to investigate	Legal obligation (art. 6, par. 1 letter a) of the EU Regulation).		

It should also be noted that, pursuant to Article 4, Law 300/1970 (Workers' Statute), the systems used are in no way used as a means of remote control of the working activities of professors, technical-administrative staff and people who work in various capacities at the University.

### **Nature of the data**

The provision of data is mandatory and is strictly instrumental to accessing University premises subject to video surveillance. Failure to provide data may make it impossible for the person concerned to access said premises.

### **Processing methods**

Video surveillance (fixed type) is carried out by means of digital cameras connected to the University's telematic network, which allow images to be viewed in real time at the control stations (Control Rooms and campus gatehouses) as well as the recording of images in "Motion Detection" mode 24 hours a day, 365 days a year.

Video surveillance is carried out primarily in the external areas strictly pertaining to the University (e.g., perimeter accesses to campuses and buildings, parking and goods loading/unloading areas, waste storage areas); no cameras are installed inside classrooms, laboratories or offices.

Images are normally taken in the long field, without prejudice to the possibility of enlargements in cases of proven necessity.

Video processing operations are carried out mainly with the aid of computerised and telematic tools, according to logics strictly related to the purposes indicated above and in any case in compliance with the principles of lawfulness, correctness and transparency provided for by the Privacy Law. It is therefore stated that:



**POLITECNICO**  
MILANO 1863

- The recordings are stored on electronic media and storage servers located at the Data Controller's premises and may only be processed by personnel specifically authorised by the Data Controller;
- Video recordings and the personal data they contain may be made available exclusively to the Judicial or Police Authorities (at their express request) for identifying the perpetrators of any unlawful acts to the detriment of the Data Controller or other persons.
- Security measures are taken as per Article 32 of the GDPR to prevent data loss, illegal or incorrect use and unauthorised access, in compliance with AgID Circular 2/2017 'Minimum ICT security measures for public administrations';
- The video surveillance system is not connected with private security companies or police forces.

The client monitoring stations are not enabled for deferred viewing of recorded images, nor do they have framing editing and zoom functions (the framing and zoom level applied are pre-defined and locked by the System Administrator during installation of the individual camera).

These stations are manned by authorised operators employed by companies designated as External Data Processors under service contracts.

For the purposes pursued, the data collected through video-surveillance systems may be accessed by employees and collaborators of Politecnico di Milano who have been expressly authorised to do so and who operate under the direct authority of the Data Controller or Data Processor to carry out processing activities, each one in relation to their assigned tasks.

### **Categories of recipients**

In connection with the stated purposes, the data may be communicated to:

- JOBBING SOC. COOP., as Data Processor pursuant to Art. 28 of the EU Regulation;

The data may also be communicated to external parties entitled to request them, such as the judicial or public security authorities.

### **Transfer to non-EU countries or international organisations**

Personal data shall in no way be transferred to non-EU countries or international organizations.

### **Rights of the data subject**

The data subject (identifiable filmed subject) can exercise, vis-à-vis the University, the rights provided for by the GDPR, namely:

- **right of access to their personal data and information** pursuant to Article 15 of the GDPR;
- **right to object to the processing of their personal data**, without prejudice to the provisions on the necessity to allow processing of one's data to be able to make use of the services offered;
- **right of restriction of processing** pursuant to Article 18 of the GDPR;
- **right to the deletion of personal data (right to be forgotten)**, except for data contained in recordings that Politecnico di Milano must compulsorily keep and unless there is an overriding legitimate reason to proceed with the processing.



**POLITECNICO**  
MILANO 1863

Considering the intrinsic nature of the data processed (images collected in real time), the right to update or supplement, as well as the right to rectification under Article 16 of the GDPR cannot be exercised in practice. The right to data portability under Article 20 of the GDPR cannot be exercised, since the images acquired by the video surveillance system cannot be transferred to third parties other than those expressly authorised and operating under the direct authority of the Data Controller or Data Processor.

An identifiable data subject may request visual access to the recordings in which he/she believes he/she has been filmed (by attaching an appropriate identification document to the request). The response to a request for access may not in any way include data referring to third parties other than the requesting party (to this end, the possibility of applying frame splitting or selective masking treatments is also excluded).

Checks on the data subject's request and subsequent decision on the recognition of the right claimed are the responsibility of the Internal Data Processor.

To only exercise the rights of access to the video recordings, as well as for any information, the interested party may contact the Contact Centre of Politecnico di Milano (contact: [contactcenter@polimi.it](mailto:contactcenter@polimi.it) - tel. 02 2399 9300). Should the data subject wish to exercise the above-mentioned rights of objection, restriction and deletion on the processing of personal data, he/she may contact the DPO of the Politecnico di Milano (contact: [privacy@polimi.it](mailto:privacy@polimi.it)).

The data subject also has the right to lodge a complaint with the competent supervisory authorities, namely the Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)).

Milan, 11.09.2023