



## **PRIVACY POLICY FOR THE PROCESSING OF PERSONAL DATA CONCERNING THE PRODUCTION OF VIDEO, PHOTOGRAPHIC, AND MULTIMEDIA, JOURNALISTIC, PROMOTIONAL, AND DISSEMINATION MATERIAL**

Pursuant to art. 13 of the EU Regulation no. 2016/679 (GDPR), information is provided on the use of personal data concerning individuals (staff, students, institutional representatives, etc.) participating in public events organized and promoted by the University (such as conventions, press conferences, meetings, workshops, and public dissemination and orientation initiatives) and involved in video footage, photographs, and promotional and dissemination multimedia material.

### **Data Controller and Data Protection Officer**

The Data Controller is the Università per Stranieri di Perugia (University for Foreigners of Perugia), in the person of the Magnificent Rector, as legal representative, with registered office in Piazza Braccio Fortebraccio, 4 – 06123 Perugia.

The contact details of the Data Controller are: [rettore@unistrapg.it](mailto:rettore@unistrapg.it), [protocollo@cert.unistrapg.it](mailto:protocollo@cert.unistrapg.it).

The contact details of the Data Protection Officer (DPO) are: [rpd@unistrapg.it](mailto:rpd@unistrapg.it), tel. 0755746302.

Further information is available at: <https://www.unistrapg.it/node/4947>.



## Purpose and Legal Basis of Processing

The data are acquired to organize the University's public events, to prepare video, photographic, and multimedia materials, to be used both as a promotional or dissemination tool for the University's activities and for internal and external communication activities entrusted to the press office, including the planning of events and thematic websites used by the University. The collected videos, photos, and multimedia materials may be used for:

1. Publication on websites belonging to the University Web system ([www.unistrapg.it](http://www.unistrapg.it), Department sites, Study Centre sites, etc.) and on institutional social platforms (Facebook, Instagram, LinkedIn, Twitter, YouTube, etc.);
2. Sending to the press as part of activities managing relations with the mass media system (printed and/or web newspapers, radio, televisions, blogs, etc.);
3. Use in dissemination activities at local, national, and international levels within the University's communication activities for orientation, promotion, and advertising purposes (promotional banners, advertisements, informational materials, etc.);
4. Storage in the University's historical archive.

The legal basis for the processing is the pursuit of institutional purposes – falling within the exercise of public functions pursuant to art. 6, para. 1, letter e) GDPR – of promoting the university institution through public and institutional



communication, as provided for by Law 150/2000. In particular, the activity is carried out to: raise awareness on issues of public and social interest; illustrate the University's activities and operations; promote the image of the University and of Italy in Europe and the world, giving visibility to events of local, regional, national, and international importance in which the Università per Stranieri di Perugia participates or promotes.

In cases where processing requires it, the consent of the data subject will be requested using the attached specific form (A) and only for the processing purposes initially stated. It should be noted that pursuant to art. 97 of Law 633/1941, "The consent of the person portrayed is not required when the reproduction of the image is justified by notoriety or the public office held (...), by scientific, didactic, or cultural purposes, or when the reproduction is connected to facts, events, ceremonies of public interest or held in public." Therefore, consent will not be requested from the data subject captured in photographic images or videos taken in places and spaces where university public events take place (conventions, press conferences, workshops, meetings and public dissemination actions, orientation initiatives and fairs, etc., also held at non-university locations such as municipal halls, city spaces, etc.).

## Type of Data and Obligation to Process

The processed data primarily concern the photographic images, videos, and audio tracks of individuals participating in the public events organized by the University and involved in the footage taken during the events themselves. The carrying out of filming activities by authorized personnel will be clearly identified with appropriate



signage, allowing participants to avoid transiting through areas subject to video/audio recording. If the event involves organization with invitations or *ad hoc* communications, the relevant privacy policy on the use of contacts provided by the data subjects for event invitations and/or communications is the one provided during the data collection phase on the event's website section.

## Processing Methods

The material collected in this way may be modified, adapted, and used, free of charge, for the University's dissemination and communication activities. Data collection will comply with the principles of relevance, completeness, and non-excessiveness in relation to the purposes for which processing is necessary. Personal data will be processed in compliance with the principles of lawfulness, fairness, and transparency provided by law, with the aid of tools suitable for recording and storing the data, and in any case, in such a way as to ensure its security and protect the data subject's confidentiality. Specific security measures will be observed to prevent data loss, unlawful or incorrect use, and unauthorized access in full compliance with art. 32 GDPR. Contact data will be used exclusively by personnel assigned to the university offices and will not be subject to communication or dissemination.

## Categories of Subjects to Whom Data May Be Communicated or Who May Become Aware of Them and Any Transfers of Data Abroad

The data will be processed by employees and/or collaborators assigned to the competent offices of the Università per Stranieri di Perugia, authorized for



processing pursuant to art. 29 GDPR (Communication Service, Press Office, Rector's Secretariat Service, etc.). The University may use consultancy service providers who, solely for the purposes of the requested service, may become aware of the data subjects' personal data, and who will be duly appointed as Data Processors in accordance with art. 28 GDPR. The data will not be communicated or otherwise processed in countries outside the EU and may be disseminated on the University's website in the cases previously described.

## Data Retention Periods

Personal data will be stored by the University for the time necessary to achieve the collection purposes and established by current legislation and/or University regulations.

## Data Subject Rights

Pursuant to arts. 15 et seq. of EU Regulation 2016/679, with respect to the collected data, the data subject may exercise the following rights: access, erasure, rectification of contact or press-disseminated data, restriction of processing, data portability, objection to processing, and withdrawal of consent. These rights can be exercised by making a request to the Data Protection Officer, using the contact details provided above. Furthermore, the data subject has the right to lodge a complaint with the Garante per la Protezione dei Dati Personalini (Italian Data Protection Authority), according to the procedures indicated at the address:

<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524>