

## VIDEORECORDING OF MASTER'S DEGREE EXAMINATION SESSION

### *Privacy policy for processing personal data collected from the data subject pursuant to article 13 Reg. (EU) 2016/679-GDPR*

To all graduating students.

Due to the emergency situation caused by the spread of the coronavirus, your degree examination session may be carried out using MICROSOFT TEAMS, for which you have already activated your Office 365 licence and which you can use with the credentials provided by the University (formula [name.surname@studenti.iulm.it](mailto:name.surname@studenti.iulm.it)).

As far as the live streaming of the examination session through the Teams platform is concerned, Microsoft Corporation will act as an autonomous Data Controller.

Should you decide to allow the audio and video recording of your degree examination session, in order to save a record of the event IULM University will proceed as follows.

#### **1. DATA PROCESSORS**

The **data controller**, pursuant to Articles 4 and 24 of Regulation (EU) 2016/679 is the **Libera Università di Lingue e Comunicazione IULM**, located in **Via Carlo Bo, 1 - 20143 Milano**, represented by its pro-tempore legal representative. In compliance with Articles 37-39 of Regulation (EU) 2016/79, the University has appointed a Data Protection Officer (DPO) who can be contacted at the following e-mail address: [dpo.iulm@dpoprofessionalservice.it](mailto:dpo.iulm@dpoprofessionalservice.it).

#### **2. PURPOSES OF PROCESSING AND LAWFUL BASIS**

The personal data provided, in this instance your image and the audio recording of your voice, will be processed in accordance with the conditions of lawful basis pursuant to **article 6, paragraph 1, letter a)** of Regulation (EU) 2016/679 for the following purposes:

**with your consent, to provide a record of the event.**

#### **3. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF DATA**

The personal data provided will in no way be communicated or disseminated to third parties, with the exception of the subjects designated pursuant to Art. 29 GDPR who provide services related to University communication and who will be responsible for managing the video recording, and the University teaching staff who will speak during the degree examination session.

#### **4. DATA TRANSFER TO THIRD COUNTRIES AND/OR INTERNATIONAL ORGANIZATIONS AND GUARANTEES**

The personal data provided **will not** in any way be transferred abroad either within or outside the European Union.

#### **5. RECORDING PROCEDURES AND PERIOD OF DATA STORAGE**

If the interested party consents to the video recording of their degree examination session it will be recorded using IULM University's own equipment. Specifically, technical solutions will be adopted that make it possible to "capture" the screen of the person concerned while excluding the possibility that the event is also recorded by the Microsoft Teams platform, which will be used for the sole purpose of allowing the live streaming of the session.

The final product of the recording will therefore be made up of the result of the "screen capture" of the data subject and the video and audio of the teaching staff who will speak during the session, if they have given their consent to the recording of their images and their voices. Otherwise, the film will consist only of the images obtained from the "capture" of the data subject's screen.

The recording will be carried out with a IULM University local personal computer (not connected to a network).

In order to proceed with the editing of the film, it will then be transferred to a server owned by IULM with a reserved access network. All these operations will be carried out in such a way as to guarantee maximum security and confidentiality by persons specifically appointed by the University.

On this server, the film will be stored for a maximum period of 30 days, during which IULM staff, appointed for this

purpose, will proceed with the final "packaging" of the film.

In compliance with the provisions of Article 5 paragraph 1, letter e) of Regulation (EU) 2016/679, the images taken during the event, once delivered to the data subject upon their specific request, will be immediately deleted and will not be published or disseminated in any way.

#### **6. NATURE OF THE CONFERMENT AND REFUSAL**

The provision of the personal data for the purposes of the video recording of your examination session is optional. You may freely decide to allow the Data controller to make video and audio recordings of your image and voice. Failure to agree to providing the personal data will make it impossible to record your degree examination session and consequently provide a lasting record of the event.

#### **7. RIGHTS OF DATA SUBJECTS**

You may exercise your rights in accordance with the provisions set out in articles 15, 16, 17, 18, 19, 20, 21, 22 of Regulation (EU) 2016/679 by contacting the Data Controller at [privacy@iulm.it](mailto:privacy@iulm.it) or the Data Protection Officer under article 38 paragraph 4.

You have the right at any time to ask the Data Controller for access to your personal data, and also to exercise your rights regarding rectification, deletion, and purpose limitation of your data. Furthermore, you have the right to object at any time to the processing of your data (including automated processing, e.g. profiling), as well as to the portability of your data. Without prejudice to any other administrative or jurisdictional appeal, should you believe that the processing of your data violates the provisions of Regulation (EU) 2016/679, pursuant to article 15 letter f) of the aforementioned Regulation (EU) 2016/679, you have the right to make a complaint to the Guarantor for the protection of personal data and, with reference to article 6 paragraph 1, letter a) you have the right to revoke the consent given at any time.

In the case of a request for data portability, the Data Controller will provide the personal data regarding the data subject from an automatic device in a structured format which is legible and in common use, without prejudice to paragraphs 3 and 4 of Article 20 of Regulation (EU) 2016/679.

Updated on 23rd March 2020