



## JOHN CABOT UNIVERSITY

### INFORMATION ON THE PROCESSING OF PERSONAL DATA PHOTO/VIDEO

John Cabot University systematically undertakes to comply with the current legislation on data protection and user privacy protection. The following information describes the provisions of articles 13 and 14 of the GDPR. Upon giving your consent for JCU to use your image, we are committed to using it only for the purpose of promoting JCU's programs and initiatives.

Your image might be published:

1. on the following websites:
  - [www.johncabot.edu](http://www.johncabot.edu)
  - <https://blog.johncabot.edu/>
  - <https://news.johncabot.edu/>
  - [myjcu.johncabot.edu](http://myjcu.johncabot.edu)
  - [www.jcualumni.org](http://www.jcualumni.org)
2. on social media platforms such as Facebook, LinkedIn, Instagram, YouTube, Snapchat, Twitter, TikTok and Pinterest;
3. in print and electronic publications, brochures, and other forms of communication such as CDs, DVDs and other multimedia platforms.

#### PERSONAL DATA CONTROLLER

John Cabot University (hereinafter "JCU" or just "University"), with registered office in Via della Lungara, 233, 00165 Rome, Italy, is the Data Controller.

#### PERSONAL DATA PROCESSORS

To process the personal data outlined in this document, John Cabot University collaborates with third party entities designated as external Data Processors. These subjects will be functional to the processing operated by JCU and bound to the principle of purpose as well as to the respect of the current legislation on the protection of personal data. It is possible to request a list of external Data Processors through the methods outlined below.

#### LEGAL BASIS FOR THE PROCESSING OF YOUR INFORMATION

We may process your image based on your consent. You may revoke your consent at any time by sending an email to [privacy@johncabot.edu](mailto:privacy@johncabot.edu).

#### DATA PROCESSING METHODS AND DATA RETENTION

Your personal data are processed in paper or electronic format. Once your consent to the processing of your image has been obtained, JCU will store it in its Content Management System and may publish it on its websites or social media.

To protect the personal data processed, JCU has adopted adequate organizational, technical, and physical measures - in accordance with the provisions of article 32 of the GDPR - in order to maintain the confidentiality, availability, and integrity of the information collected.

All information provided within the Website is encrypted using the 128-bit Secure Sockets Layer (SSL) system and public key encryption.

The Website is certified as a "Comodo secure site." To learn more about the safety certification program, we recommend that you visit the [www.comodo.com](http://www.comodo.com) sites.



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Notwithstanding the foregoing, users and visitors of the JCU Website shall keep in mind that the Website and all associated services are managed on software, hardware and networks systems, whose components may, from time to time, require maintenance or be subject to inefficiencies (which JCU will try to resolve promptly).

Processed data are kept for the time necessary for the above purpose, after which they are deleted.

### **TRANSFER OF DATA OUTSIDE OF THE EUROPEAN UNION**

The personal data of the data subjects may be transferred to (i) Canada for which the European Commission has expressed its Adequacy Decision on December 20, 2001, in compliance with the European Parliament and Council Directive 95/46/EC and regarding adequacy of the protection provided by the Canadian Personal Information Protection and Electronic Documents Act, to (ii) the United States of America through a certified data controller pursuant to the Privacy Shield Agreement, as well as (iii) to California (USA) in this case adopting the clauses "EU controller to non-EU or EEA processor" referred to in decision 2010/87 / EU with the controller.

### **DATA SUBJECT'S RIGHTS**

In the case provided, the data subject has the right to obtain access to personal data from JCU and the rectification or erasure of them or the restriction of the processing that concerns him/her or to object to processing (articles 15 to 22 of GDPR). Data subjects have the right to lodge a complaint with the Supervisory Authority.

The data subject can provide his/her requests to JCU by writing to the Referent for the protection of the data subject's rights (also known as DPO – Data Protection Officer) located in Via della Lungara, 233, 00165 Rome, Italy, or by sending a communication to the address [privacy@johncabot.edu](mailto:privacy@johncabot.edu).

If you believe that we have collected information on an under 14 year old, without the consent of or in contrast with the will of the person who exercises parental responsibility, please contact us at [privacy@johncabot.edu](mailto:privacy@johncabot.edu) so that we can either manage the complaint or delete the information.

### **SUBSEQUENT CHANGES TO THIS POLICY**

JCU reserves the right to modify the information on this document, by publishing the changes on the website <https://www.johncabot.edu/privacy/default.aspx>, therefore we advise the data subject to periodically check this information.



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### PHOTO/VIDEO DISCLAIMER

The undersigned

<b>NAME</b>	
<b>LAST NAME</b>	
<b>BORN IN (PLACE)</b>	
<b>DATE OF BIRTH</b>	
<b>WITH REGISTERED ADDRESS IN</b>	

having read the above information, gives his consent to the processing of his image and voice (photo/audio-video), for the purposes indicated therein, also through the publication and dissemination of information material of the university and/or on the University's internet portals and social media accounts.

Place and date \_\_\_\_\_ Signature (or Parent/Legal Guardian Signature) \_\_\_\_\_

The undersigned, as identified above, pursuant to articles 10 and 320 of the Civil Code and articles 96 and 97 of the Law of 22 April 1941, n. 633 (Law on copyright),

**authorizes**

the aforementioned Data Controller to the possession of photographic and video materials containing his/her image and voice and to the use of such materials for the publication and dissemination on the Data Controller's websites, on any platform dedicated to the web-streaming of the event, in magazines, books, brochures, or flyers and in any other media intended for dissemination, including social media, also for promotional purposes of the activity carried out by the Owner, as well as for reproduction purposes, without having anything to claim or complain. This authorization may be revoked at any time through a registered letter with return receipt to the Data Controller, at the registered office as indicated on the headed paper. The withdrawal will take effect from the date of receipt of the registered letter from the Owner, who will be required to certify the removal of the images subject to cancellation. It is understood that the revocation will have no effect with respect to the treatments already carried out, nor will it take effect in the event that the cancellation/removal of the data has become unfeasible or in any case difficult to carry out, for example in the case of copying images and/or filming and/or other carried out by third parties on their own media and in the event of their publication in brochures or leaflets. The undersigned relieves the Owner from any liability inherent in incorrect use of photographic material by users of the sites or, in any case, by third parties; with this release, the Owner is relieved without prejudice to any direct or indirect liability inherent in damage to the image or confidentiality that go beyond the obligations to which he is required by law. Any use in contexts other than specified and/or in ways that might be offensive and/or damaging to my own personal integrity and reputation are strictly forbidden.

The use of my personal image is completely free of charge.

Place and date \_\_\_\_\_ Signature (or Parent/Legal Guardian Signature) \_\_\_\_\_