



## Videosurveillance Privacy information 2026

AMERICAN OVERSEAS SCHOOL OF ROME (AOSR) - PRIVACY NOTICE (ART. 13 GDPR) - CCTV (SECURITY) + PHOTO/VIDEO RECORDING AT AOSR EVENTS

This Privacy Notice explains how American Overseas School of Rome (“AOSR” or the “School”) processes personal data through:

- (A) CCTV (video surveillance) on campus for security and protection of people and property; and*
- (B) photo/video recording during AOSR-sponsored events for school communications.*

### 1) DATA CONTROLLER

The Data Controller (Art. 4(7) and Art. 24 GDPR) is:

American Overseas School of Rome (AOSR)

Via Cassia 811, 00189 Rome, Italy

Privacy contact: [privacy@aosr.org](mailto:privacy@aosr.org)

### 2) CATEGORIES OF PERSONAL DATA PROCESSED

#### A) CCTV (Security):

- video images of people entering and moving through monitored areas on campus;
- no audio is recorded by the CCTV system.

#### B) Photos/Videos at Events:

- photos and video recordings of participants (adults and minors), individually or in groups;
- where applicable, voice/audio captured incidentally in video recordings;
- limited identifying information (e.g., name/role/class/grade) only if necessary and consistent with the permissions/consents collected.

### 3) PURPOSES OF PROCESSING

#### A) CCTV (Security only):

CCTV is used exclusively for:

- prevention and management of intrusions, theft, vandalism, damage and other security incidents; and
- protection of individuals on school premises (employees, students, visitors) and incident handling.

CCTV is NOT intended for and is NOT used to monitor employees’ day-to-day work performance.



B) Photos/Videos at AOSR events:

AOSR may use event photos/videos for:

- documentation of school life and event reporting (including internal communications); and
- AOSR communications and promotion (e.g., AOSR website, newsletters, brochures, and official social media channels).

## 4) LEGAL BASIS

A) CCTV (Security):

AOSR processes CCTV images on the basis of its legitimate interest (Art. 6(1)(f) GDPR) in ensuring safety and protecting people and property. AOSR performs and maintains a Legitimate Interest Assessment (LIA) balancing security needs with the rights and freedoms of individuals.

B) Photos/Videos at Events:

Depending on the specific use, AOSR relies on:

- Consent (Art. 6(1)(a) GDPR) for the capture and/or publication of identifiable images for external communications/promotional purposes where required and/or where AOSR has chosen consent as the most appropriate legal basis. For minors, consent is collected from a parent/legal guardian where applicable.
- Legitimate interest (Art. 6(1)(f) GDPR) for general event documentation and “context/crowd” images where individuals are not the main subject, subject to appropriate safeguards and the right to object.

## 5) HOW TO OPT OUT / OBJECT / WITHDRAW CONSENT

A) CCTV:

If processing is based on legitimate interest, you may object at any time (Art. 21 GDPR) by contacting AOSR using the details in Section 1. AOSR will assess the request and will stop processing unless it demonstrates compelling legitimate grounds overriding your interests, rights and freedoms, or the processing is required for legal claims.

B) Photos/Videos at Events:

- At the event venue: inform an AOSR staff member at the registration/check-in desk (or the Communications Office representative).
- After the event: email the Communications Office at [esmith@aosr.org](mailto:esmith@aosr.org) within 30 days.

Where processing is based on consent, consent may be withdrawn at any time (Art. 7 GDPR). Withdrawal does not affect processing carried out before withdrawal.

AOSR will take reasonable steps to avoid capturing or using identifiable images of individuals who object/opt out (e.g., avoiding close-ups, selecting alternative footage, excluding images from publication, or blurring where feasible). Please note that it may not always be possible to prevent incidental capture in wide-angle group or crowd scenes.



## 5bis) NATURE OF PROVISION OF DATA

CCTV: entering CCTV-monitored areas is voluntary; however, individuals who enter those areas may be recorded for security purposes. Where feasible, you may avoid monitored areas; please note that certain access points and common external areas may be monitored for safety reasons.

Event photos/videos: providing your image is optional. AOSR offers an opt-out process (Section 5). Where feasible, AOSR will avoid close-ups of individuals who opt out and will exclude identifiable images from publication.

## 6) RECIPIENTS / CATEGORIES OF RECIPIENTS

Personal data may be accessed by:

- authorised AOSR staff acting under the authority of the Data Controller (need-to-know basis; e.g., Security/Administration/IT for CCTV; Communications for event images);
- external service providers appointed as Data Processors under Art. 28 GDPR (e.g., CCTV maintenance providers; IT/hosting providers; professional photographers/videographers; communication agencies; newsletter platforms), where applicable;
- public authorities / law enforcement bodies when required by law or upon valid request/formal process.

Social media platforms (e.g., Meta, Google/YouTube, LinkedIn) generally act as independent Data Controllers for processing they carry out for their own purposes under their terms/policies.

## 7) INTERNATIONAL TRANSFERS (OUTSIDE THE EEA)

Where services/platforms used by AOSR may involve transfers outside the European Economic Area, transfers will be carried out in accordance with Chapter V of the GDPR (Art. 44 et seq.), using appropriate safeguards (e.g., adequacy decisions or Standard Contractual Clauses), as applicable.

## 8) RETENTION PERIOD

### A) CCTV:

CCTV recordings are retained for a limited period consistent with security purposes and then automatically overwritten.

CCTV recordings are retained for **96 hours (4 days)** and then automatically overwritten, unless longer preservation is required to investigate a specific security incident (e.g., theft/vandalism) or to establish, exercise or defend legal claims. Preserved segments are retained only for the time strictly necessary for those purposes and are subject to access restrictions.

### B) Event photos/videos:

AOSR retains event materials for no longer than necessary (Art. 5(1)(e) GDPR). As a general rule:

- raw event photo/video material is retained for up to 90 days to select and finalise communications materials;
- selected images/videos used for institutional communications may be retained in AOSR archives until no longer relevant, subject to periodic review;
- content published on AOSR website/social media may remain online until removed; removal requests will be assessed and implemented where feasible, considering technical constraints and third-party platform policies.



## 9) SECURITY MEASURES (ARTS. 25 AND 32 GDPR)

AOSR applies privacy-by-design/default and appropriate technical and organisational measures to protect personal data, including:

- minimised camera angles focused on access points/critical areas and exclusion of sensitive areas (e.g., restrooms/changing rooms);
- restricted access to live view/recordings and role-based authorisations;
- logging of access and exports where applicable;
- security controls to protect systems and data (e.g., access control, updates, segregation/secure configuration);
- no disclosure of footage; release to law enforcement only upon valid request/formal process;
- retention limits and controlled preservation of segments only in the event of an incident.

## 10) DATA SUBJECT RIGHTS (ARTS. 15–22 GDPR)

You may exercise the rights under Articles 15–22 GDPR (access, rectification, erasure, restriction, objection, etc.) by contacting AOSR at [privacy@aosr.org](mailto:privacy@aosr.org).

Where processing is based on legitimate interest, you have the right to object at any time (Art. 21 GDPR).

Where processing is based on consent, you may withdraw consent at any time (Art. 7 GDPR).

## 11) AUTOMATED DECISION-MAKING

AOSR does not use CCTV recordings or event photos/videos for automated decision-making, including profiling, within the meaning of Article 22 GDPR.