



Instructions for the processing (capturing Photography and Video) of Personal Data during the implementation of EUC events

In the context of European University Cyprus' (EUC) compliance with the General Regulation for the Protection of Personal Data and Regulation (EU) 2016/679 we have prepared a guide for the information and application by all members of the University (employees, services, members, collaborating bodies etc.).

In many events (conferences, seminars, teleconferences, swearing-in ceremonies, etc.), the EUC, for documentation and promotion purposes, may take photos and videos or record the teleconferences, possibly collecting personal data of the participants (voice, image, comments, other personal characteristics depending on the shoot). **These instructions only concern the case where there is some form of recording and/or transmission of personal data.**

When you want to Photograph, Videotape people, or simultaneously webcast an event for dissemination/marketing or other purposes:

We need consent from the participants:

For Small Events that are usually scheduled at irregular intervals during the year and other occasions such as Photography and/or Videography in the library area, cafeteria, classroom events, conference rooms, presentations, etc.

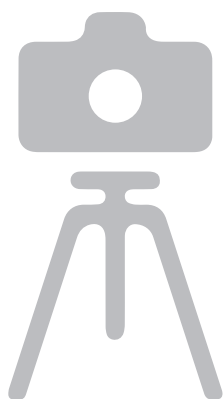
- Where people **do not** expect under normal circumstances to be photographed/Videotaped.
- Where it is practical and feasible to obtain consent (usually in crowds of less than 30 people). We need consent from each person who can be identified in the photo or video.
- When we know in advance the people who will attend the event. (That is, it is not an open event where anyone can attend).

When a single image of an individual is displayed anywhere for marketing purposes, we need the individual's consent.

Consent is obtained through the **Consent Form** where all relevant information is provided such as the purposes of the processing, the legal basis for the processing, etc.

Information must precede consent so that both together form a single structure.

Opening the microphones or the camera on the teleconferencing platform is a manifestation of the individual's free will, which clearly indicates his consent to the processing of his personal data for the specific purposes.



We do not need consent from participants:

For Major events that are often planned in advance at regular intervals (e.g. annually or per semester), such as Graduation, events of the Study and Student Welfare Service (welcome party, etc.), Start-Up Center events, Live Streaming events, Open Day and other Public Events etc.

- Where it is not practical and practicable to obtain consent (usually crowds of more than 30 people)
- When we do not know in advance the people who will attend the event (that is, it is an open event where anyone can attend)

Information about Photography and Videography where the legal basis you are using is the law of interests and we do not need consent, be made online through the [Photography and Video Notice](#).

Timely Update:

It is very important to inform in advance that the event we will organize may be photographed/videotaped so that we give people the option if they do not want to be recorded not to attend the event.

- E.g. We must, at a minimum, include in the invitation to the event a note that: "The event is to be photographed and/or videotaped for dissemination purposes."
- E.g. "Please be advised that in the Electrical Engineering course (ELE107) on 04/24/2023 for industry certification purposes, there will be a 20 minute video recording".

Informing persons can be done, depending on the way of organization and recording cases, in the invitation to the event which can be done via websites or personal email or in the participation/consent event form, or in combination.

Minors:

If the photo or video or any other process contains personal data of minors, **parental consent is required**.

Storage of Personal Data

Photographs and videos that contain personal data and the collection of consent itself is also processing of personal data. For photos and videos and for consents whether collected electronically by e-mail or in electronic forms or in paper form we must always implement appropriate technical and organizational measures in order to ensure an appropriate level of security in accordance with the General Data Protection Regulation.

All digital personal data must be stored in a secure place digitally, in a digital space provided by the European University of Cyprus (Microsoft Office, MS Forms, MS OneDrive and File Server) using a password and other relevant security procedures and technologies.

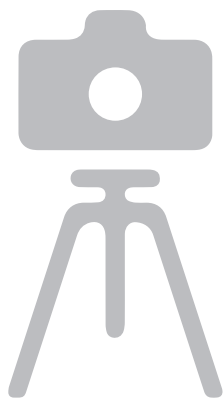
All paper personal data must be stored in a secure place.

Data subject rights:

Individuals whose personal data is captured in the photo or video have rights under the GDPR, including the right to access, correct, delete and restrict the processing of their personal data. You must be prepared to respond to any requests from individuals about their rights.

The first right in the case of consent is the person's ability to withdraw their consent at any time. The withdrawal of consent does not affect the legality of the processing before it. Thus, for example, a publication of a photo in a magazine cannot be revoked, but a publication on a social media where photos and videos were posted can be revoked. In case of total withdrawal of consent, the part of the electronic file that concerns the person should also be deleted or anonymized (see below).

The rights that can be granted to the person are the withdrawal of consent, the deletion of personal data and the restriction of processing. The other rights that the person will request will be dealt with jointly and on a case-by-case basis with the DPO.



Anonymization of personal data:

As a rule, avoid taking and posting photos and videos that clearly show people's faces.

We do not aim to record any particular individual as the photos and videos are intended to advertise the overall success of the Event.

The techniques that can be used to capture or display images (photos and videos) without requiring consent are:

- Images with low resolution, so that the faces of the participants cannot be distinguished.
- Images with the audience's back in the background so that no faces are visible.
- In the case of close-ups, use face-blurring techniques for those who do not have consent or who withdraw their consent.
- Remote shooting (distant shots, shooting with a drone from above, etc.), where it is proven that no faces are visible.
- Post photos where e.g. the library is full of people, but no person can be identified as the faces are out of focus.
- Post photos taken at such angles where the crowd is visible but it is difficult to identify students or other people. Prefer people's backs to be seen and only the faces of the workers and teachers to be seen.

It is recommended to minimize the data by using anonymization techniques during the recording phase and without additional processing techniques of the files.