



Data Protection Statement

of the international research project
“Bilderfahrzeuge. Aby Warburg’s legacy and the Future of Iconology”

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1. Policy Statement

The international Research Project “Bilderfahrzeuge. Aby Warburg’s Legacy and the Future of Iconology” (hereafter called “The Project”) is committed to complying with the General Data Protection Regulation as an academic research organisation. In order to do this the Project commits that:

- We process our data fairly and legally
- We support the rights of individuals
- We keep our personal data secure
- We design privacy into our systems and processes

2. Definitions

The General Data Protection Regulation governs the processing of personal data. The following definitions are used:

- • **Personal data** are data which can identify living individuals. As well as images, names and contact details it can also include numerical or statistical information from which an individual’s identity can be derived.
- • **Special Category Data** are personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.
- • A **Data Subject** is the individual who is the subject of personal data.
- • A **Data Controller** determines the purposes for which personal data are processed. The controller is ultimately responsible for the personal data, whether they pass the data to a data processor or not. This includes the responsibilities of responding to Subject Access Requests and complaints from data subjects.
- • A **Data Processor** is any individual or organisation who processes personal data on behalf of – and according to the purposes defined by – the data controller.



3. Principles

The project is required to process personal data according to the following six principles:

Data Protection Principles	The context for the Project
<i>Lawfulness, fairness and transparency</i>	The Project explains to its staff how it processes personal data at the point of collection and for what purposes
<i>Purpose limitation</i>	The Project only uses the personal data it has for the purposes it was collected for
<i>Data Minimisation</i>	The Project only collects personal data which is relevant to the purposes it is required for
<i>Accuracy</i>	The Project ensures that the data is correct, up to date and able to be rectify any mistakes quickly
<i>Storage Limitation</i>	The Project does not retain personal data for longer than it is needed
<i>Integrity and Confidentiality</i>	The Project protects its personal data against unauthorised access, loss or destruction by a range of security measures

4. Legal basis for processing – personal data

The Project needs to meet one of the six lawful bases in order to process personal data. The most common for the Project will be the following:

Legal basis	Examples for the Project
<i>Necessary for the performance of a contract</i>	Covers the majority of processing for our staff
<i>Data subject has given consent to the processing</i>	Covers mailing lists and event outreach for staff
<i>Necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</i>	Covers the retention of our staff lists and emergency contact information
<i>Necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data</i>	Covers activities around alumni, outreach and event programming



5. Rights

Data subjects – our students, staff and customers – have a number of rights under the Regulation. These include:

Right	The context for the Project
<i>Right of access</i>	Data subjects have the right to find out about what we are doing with their data, check we're holding it correctly and to obtain a copy of what we hold.
<i>Right to rectification</i>	The Project makes every effort to ensure its data is accurate. If a data subject thinks something we hold about them is wrong, they can ask for this to be corrected. The Project will assess the request and correct any inaccuracy.
<i>Right to erasure / right to be forgotten</i>	Data subjects have the right to ask us to remove or delete data we hold on them. The Project will assess the request and respond accordingly.
<i>Right to restriction of processing</i>	Data subjects may, in the course of a dispute with the Project about the use of their data, ask the Project to stop using their data if certain criteria applies.
<i>Right to data portability</i>	Data subjects have the right to ask the Project to provide them with a re-usable electronic copy of their data to allow them to transfer it to another provider. This only covers data submitted to the Project by the subject or data observed from the subject's use of a service. If technically possible, the Project will consider transferring information directly to another provider.
<i>Right to object</i>	Data subjects have the right to object to processing based on legitimate interests, legal obligation or for the purposes of direct marketing or for "scientific or historical research purposes or statistical purposes". The Project will assess the request and respond accordingly.
<i>Automated decision making, including profiling</i>	If the Project is making decisions about data subjects through purely automated means, such as a computer algorithm, data subjects can appeal against this decision. The Project will ensure that subjects can express their point of view and have member of staff provide a review and explanation of the decision.

6. Cooperation for Data protection with other institutions

The Project cooperates with other partners. In the case of the Project's programme and research being conducted at the Warburg Institute, London the Data Protection Policy of the University of London applies.

Regarding the Mail accounts (@bilderfahrzeuge.org) used by the Project and administered by the Max Weber Stiftung – Deutsche Geisteswissenschaftliche Institute im Ausland, the Data Protection policy of the latter applies.

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