DREAM APPLY

Privacy Notice pursuant to Article 13 of EU Regulation 2016/679 (GDPR)
Information on the processing of personal data collected from the data subject

1. DATA CONTROLLERS

- **DATA CONTROLLER**, pursuant to Articles 4 and 24 of EU Regulation 2016/679, is **Libera Università di Lingue e Comunicazione IULM**, Via Carlo Bo, 1 - 20143 Milan, represented by its pro-tempore legal representative.
- **JOINT DATA CONTROLLER (exclusively for the "Foundation Year IULM" program):** Pursuant to Article 26 of EU Regulation 2016/679, solely for the processing activities related to application management, assessment of requirements, and delivery of the Foundation Year IULM program, Libera Università di Lingue e Comunicazione IULM acts as Joint Data Controller together with **The Italian Academy S.r.l.**, with registered office at Via San Giovanni delle Catacombe n. 7, Siracusa (SR), VAT no. 00731730891. The Parties have entered into a Joint Controllership Agreement defining their respective roles and responsibilities. The essential contents of the agreement are available upon request by writing to privacy@iulm.it
- The University has appointed a Data Protection Officer (DPO), pursuant to Articles 37–39 of EU Regulation 2016/679, who can be contacted at the following email address: dpo.iulm@dpoprofessionalservice.it.

2. PURPOSES AND LEGAL BASIS OF PROCESSING

The personal data provided will be processed in compliance with the lawful conditions set out under Article 6 of EU Regulation 2016/679 for the following purposes:

- **A) Pursuant to Article 6 par. 1 lett b)**
  - Account creation and registration on the website;
  - Email transmission of the "access code" obtained during the registration phase;
  - Verification of the required admission criteria (e.g., validity of foreign qualifications; basic knowledge of Italian; for Foundation Year applicants, completion of 11 years of schooling) to take the admission test and subsequently proceed with enrollment in the chosen study program.
- **B) Pursuant to Article 6(1)(a):**
  - Subject to prior consent and until opposition, receipt of communications via email (newsletters, mailing lists) concerning educational offers, events, and initiatives promoted by Libera Università di Lingue e Comunicazione IULM.

3. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF DATA

Personal data provided may be communicated to recipients appointed pursuant to Article 28 of EU Regulation 2016/679 as Data Processors and/or natural persons acting under the authority of the Controller/Joint Controller and Processor, in order to comply with contracts or related purposes. Specifically, data may be communicated to recipients belonging to the following categories:

- Entities providing services for the management of the information system and communication networks of Libera Università di Lingue e Comunicazione IULM (including email and the IULM web platform);
- Internal departments of the University (e.g., Information Technology, Communications);
- Diplomatic representations, Embassies, and Consulates for the processing of visa and residence permit applications (where applicable);
- Competent Authorities for compliance with legal obligations, upon request.

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

Personal data may be transferred abroad within the European Union to enable the Controller/Joint Controller to use cloud services. Should it become necessary to transfer data to non-EU countries (e.g., for contacts with Embassies or representations in the student's country of origin), such transfer will take place in accordance with the appropriate safeguards provided under Chapter V of the GDPR (e.g., adequacy decisions or standard contractual clauses).

5. DATA RETENTION PERIOD OR CRITERIA

Processing will be carried out using automated tools and procedures designed to ensure maximum security and confidentiality by individuals specifically authorized for this purpose. In accordance with Article 5(1)(e) of EU Regulation 2016/679, personal data collected will be stored in a form that permits identification of data subjects for no longer than is necessary for the purposes for which they are processed, and in any case for a maximum period of 3 years if enrollment of the data subject does not take place.

6. NATURE OF PROVISION AND REFUSAL

Providing personal data for purpose A) under section 2 of this document is necessary to manage the purposes described therein. Failure to provide personal data will make it impossible to register on the site and submit an application for enrollment at the University or the Foundation Year. Providing data for purpose B) (newsletter subscription) is optional; however, failure to provide data will result in the inability to receive newsletters regarding events and initiatives, without affecting purpose A) in any way.

7. RIGHTS OF DATA SUBJECTS

You may exercise your rights as expressed in Articles 15, 16, 17, 18, 19, and 20 of EU Regulation 2016/679 by contacting the Controller, Data Processor, or the Data Protection Officer at privacy@iulm.it. You have the right, at any time, to request access to your personal data, their rectification, erasure, or restriction of processing from the Data Controller. You also have the right to request data portability. Without prejudice to any other administrative or judicial remedy, if you believe that the processing of your data violates EU Regulation 2016/679, pursuant to Article 15(f) of the aforementioned Regulation, you have the right to lodge a complaint with the Data Protection Authority (Garante per la protezione dei dati personali) and, with reference to Article 6(1)(a) and Article 9(2)(a), you have the right to withdraw your consent at any time. In the event of a data portability request, the Data Controller will provide your personal data in a structured, commonly used, and machine-readable format, subject to paragraphs 3 and 4 of Article 20 of EU Regulation 2016/679.

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