



## **Activation and management of alias careers**

Policy for the Processing of personal data collected from the person concerned art. 13 of EU Reg. 2016/679 - GDPR

### **1. DATA PROCESSORS**

The DATA CONTROLLER pursuant to articles 4 and 24 of EU Reg. 2016/679 is **Libera Università di Lingue e Comunicazione IULM**, with headquarters in Via Carlo Bo 1 - 20143 Milan, in the person of its pro-tempore legal representative. The University, in accordance with art. 37-39 Reg. UE 2016/679, appointed Data Protection Officer, who can be contacted at the following email address: [dpo.iulm@dpoprofessionalservice.it](mailto:dpo.iulm@dpoprofessionalservice.it).

### **2 .FINALITÀ E LICEITA' DEL TRATTAMENTO**

in compliance with the provisions of art. 6, par. 1 lett. a) of EU Reg. 2016/679 and according to the wish of data subject, personal data will be processed to activate, within the University, a different identity from identity registry (alias career). This is to protect the psycho-physical well-being of those who do not recognize themselves in the gender associated with their biological sex.

### **3. DESTINATARI O CATEGORIE DI DESTINATARI DEI DATI**

Personal data shall be processed exclusively by internal University personnel operating under the authority of the Controller and duly trained pursuant to art. 29 of EU Reg. 2016/679.

### **4. TRASFERIMENTO DATI VERSO UN PAESE TERZO E/O UN'ORGANIZZAZIONE INTERNAZIONALE**

Personal data will not be transferred abroad within or outside the European Union.

### **5. PERIODO DI CONSERVAZIONE O CRITERI**

Data shall be processed automatically, in a manner and with tools that ensure maximum security and confidentiality, by specifically appointed subjects.

In compliance with the provisions of art. 5 par. 1 lett. e) of EU Reg. 2016/679, the collected personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. Specifically, the data relating to the alias career will be kept until the moment of graduation, unless the definitive sentence of rectification of gender attribution, issued by the competent judicial authority, intervenes before. In this case, the personal data of the applicant's career is updated on the basis of the operative part of the sentence itself and the original personal data are overwritten.

### **6. NATURA DEL CONFERIMENTO E RIFIUTO**

Provision of personal data for the purposes of paragraph 2) of this policy is necessary in order to activate the alias career. Failure to provide it will not allow the possibility of using the transitional identity during university career.

### **8. DIRITTI DEGLI INTERESSATI**

You shall be able to exercise your rights under articles 15, 16, 17, 18, 19, 20 of EU Regulation 2016/679 by writing to the Data Controller or the Data Protection Officer at the following address: [privacy@iulm.it](mailto:privacy@iulm.it).

You shall have the right to obtain, at any moment, from the Controller, access to your personal data, and their rectification or erasure, as well as the restriction of their processing. Moreover, you have the to receive the personal data concerning you. Without prejudice for any other administrative and jurisdictional recourse, if you believe that the processing of your personal data violates the provisions of EU Reg. 2016/679, you have the right, pursuant to art. 15 letter f) of said EU Reg. 2016/679, to lodge a complaint with the Data Protection Authority and, pursuant to art. 6 paragraph 1 letter a) and to art. 9 paragraph 2 letter a), to revoke your consent to the processing at any time. In case of a request for data portability, the Data Controller shall provide your personal data to you in a structured, commonly used and machine-readable format, without prejudice for the provisions of paragraphs 3 and 4 of art. 20 of EU Reg. 2016/679.

Updated on: : 8 marzo 2023



**CONSENT FOR THE PROCESSING OF PERSONAL DATA, pursuant to articles 7, 13 and 15 f EU Regulation 2016/679.**

Pursuant to and by virtue of articles 7, 13 and 15 of EU Reg. 2016/679, I, the undersigned \_\_\_\_\_, having read the privacy policy of the International University of Languages and Media IULM,

**HEREBY CONSENT TO THE PROCESSING OF MY PERSONAL DATA, INCLUDING THOSE OF A SPECIAL CATEGORY.**

For the purpose of activating and managing a alias career, that is, the possibility of using an identity different from my registry identity, during my university studies

Date \_\_\_\_\_

Signature and consent \_\_\_\_\_