

REQUEST TO PARTICIPATE IN EVENTS ORGANIZED BY IULM UNIVERSITY

Privacy Notice for the Processing of Personal Data Collected from the Data Subject

1. WHO IS THE DATA CONTROLLER? HOW TO CONTACT THEM?

DATA CONTROLLER, pursuant to Arts. 4 and 24 of EU Reg. 2016/679, is Libera Università di Lingue e Comunicazione IULM, located in Via Carlo Bo n. 1 – 20143 Milan, represented by its pro-tempore legal representative, contactable at privacy@iulm.it.

2. HAS A DATA PROTECTION OFFICER BEEN APPOINTED? WHAT ARE THEIR CONTACT DETAILS?

Pursuant to Arts. 37 – 39 of EU Reg. 2016/679, the University has appointed a Data Protection Officer (DPO), who can be contacted at the following email address: dpo.iulm@dpoprofessionalservice.it.

3. MAIN DEFINITIONS OF PROCESSABLE DATA

Personal data: any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

4. PURPOSES, LEGAL BASIS, RETENTION PERIOD AND NATURE OF DATA PROVISION

PURPOSE OF PROCESSING	LEGAL BASIS	DATA RETENTION PERIOD	NATURE OF PROVISION
A) Fulfillment of the request to participate in the event of interest and performance of instrumental activities, with the exclusion of any disclosure to third parties.	Art. 6, par. 1, letter b) of GDPR as legal basis for processing.	Personal data collected will be stored in a form permitting identification of data subjects for no longer than necessary to achieve the purposes, and in any case for a period not exceeding two years from the event registration request.	Provision of personal data for these purposes is necessary to manage your request to participate in the event.
B) Subject to prior consent and until your opposition, sending communications – via email (newsletter) or SMS – relating to educational offerings, events, and initiatives promoted by IULM	Art. 6, par. 1, letter a) consent as legal basis for processing.	Data will be retained and used until consent is revoked.	Provision of data is optional; however, failure to provide personal data will make it impossible to receive newsletters concerning events and initiatives,

University.

without prejudice to purpose A) (event participation).

To compare and possibly improve automated communication results, the Controller uses systems with reports (pixel tracking in emails). Through pixel tracking, the Controller can learn, for example: number of readers, opens, unique link clickers and clicks, devices and operating systems used, user activity details, sent/delivered/undelivered/forwarded email details. All data are used to compare and improve communication results.

C) Categorization of event participants based on parameters, to send targeted promotional communications relevant to specific category/group needs (e.g., IULM student, retiree, executive, graduate, etc.).

Art. 6, par. 1, letter f) legitimate interest of the controller as legal basis.

In accordance with Recital 47 of the GDPR, the Controller carried out a balancing test between its interests (promotional/dissemination goals) and the fundamental rights/freedoms of participants (students, visitors, employees), taking into account relationships between data subjects and the Controller.

Data will be retained for no longer than 12 months.

Provision of data is optional (the option to skip exists, even if marked required); however, failure to provide data will make it impossible to receive targeted event invitations, without prejudice to purpose A) (event participation).

D) Handling data subject requests regarding personal data protection and other data subject requests, pursuant to Arts. 15 et seq. GDPR (data subject rights).

Art. 6, par. 1, letter c) of GDPR as legal basis for processing.

5 years from the closure of the request, except in cases of ongoing litigation.

Provision of personal data is mandatory, as it is indispensable for executing legal obligations.

5. TO WHOM WILL PERSONAL DATA BE COMMUNICATED? RECIPIENTS OF DATA

Personal data provided may be communicated to recipients who will process them as independent Data Controllers or Data Processors (Art. 28 of EU Reg. 2016/679) and processed by natural persons (Art. 29 of EU Reg. 2016/679) acting under the authority of the Controller and Processor based on specific instructions regarding processing purposes and methods.

Specifically, data may be communicated to recipients belonging to the following categories:

- Authorized internal personnel within the Controller's organization;

- Insurance entities for accident management;
- Competent authorities for legal compliance obligations, upon request;
- Entities providing maintenance on the IT system and data collection platform;
- Marketing companies for the pursuit of the purposes specified in this privacy notice.

Entities belonging to the above categories perform functions as Data Processors or operate independently as distinct Data Controllers. The updated list of designated Data Processors is maintained at the headquarters of Libera Università di Lingue e Comunicazione IULM.

6. IS THERE DATA TRANSFER TO A NON-EEA COUNTRY?

As a rule, data are not transferred outside the European Economic Area (EEA). Should transfer become necessary, it will take place exclusively to countries covered by adequacy decisions or through the adoption of Standard Contractual Clauses (SCC) and appropriate technical/organizational security measures (e.g., encryption) to protect data according to GDPR standards.

7. IS THERE AN AUTOMATED DECISION-MAKING PROCESS?

Personal data will be subject to traditional manual, electronic, and automated processing. Please note that no fully automated decision-making processes are carried out.

8. RIGHTS OF THE DATA SUBJECTS

You may exercise your rights as expressed in Arts. 15, 16, 17, 18, 19, 20, 21 of EU Regulation 2016/679 by contacting the Data Controller at privacy@iulm.it, or the Data Protection Officer pursuant to Art. 38 paragraph 4 at dpo.iulm@dpoprofessionalservice.it.

You have the right, at any time, to request access to your personal data, their rectification, erasure, or restriction of processing. Furthermore, you have the right to object at any time to the processing of your data (including automated processing, e.g., profiling) as well as the right to data portability. Without prejudice to any other administrative or judicial remedy, if you believe that data processing concerning you violates EU Reg. 2016/679, pursuant to Art. 15 letter f) of EU Reg. 2016/679, you have the right to lodge a complaint with the Data Protection Authority (Garante per la protezione dei dati personali) and, with reference to Art. 6 paragraph 1 letter a) and Art. 9 paragraph 2 letter a), you have the right to revoke consent at any time.

To opt out of receiving email communications, you may use IULM's automated cancellation link provided in emails (opt-out) or email privacy@iulm.it with the subject line 'Unsubscribe from marketing'.

Consent management for pixel tracking is provided through the footer of email communications received.

In case of a data portability request, the Controller will provide your personal data in a structured, commonly used, and machine-readable format, subject to paragraphs 3 and 4 of Art. 20 of EU Reg. 2016/679.

9. AMENDMENTS TO THIS PRIVACY NOTICE

The Data Controller reserves the right to change, modify, add, or remove portions of this Privacy Notice. To facilitate verification of changes, the notice will state the date of the latest update.

Last updated: October 22, 2022