



ENROLMENT IN Ph.D COURSES

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

In compliance with the provisions of EU Reg. 2016/679 (European Regulation for the Protection of Personal Data), below is all relevant information on the processing of the provided personal data.

1. DATA PROCESSORS

The DATA CONTROLLER, pursuant to articles 4 and 24 of EU Reg. 2016/679, is the **International University of languages and Media 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

2. PURPOSE AND LAWFULNESS OF PROCESSING

Personal data shall be processed lawfully, in compliance with the provisions of art. 6 lett. C) and E) of EU Reg. 2016/679, in order to:

- allow the interested parties to submit an application to participate in the Competition for admission to the Research Doctorate courses;
- allow University to check the fulfilment of the requirements for the selection activities;
- allow the University to manage the selection procedure, in all its phases, including the publication of the results and rankings on its Portal.

In case of admission of the interested party to the PhD program, the same data will be used for the purpose of managing the didactic-administrative relationship between the University and the PhD students.

3. DATA RECIPIENTS OR RECIPIENT CATEGORIES

The supplied personal data may be transferred to the recipients mentioned in art. 28 of EU Reg. 2016/679, who shall process them in the capacity of data processors and/or as individuals operating under the authority of the Controller and Processor, in order to comply with the relevant contracts or purposes. More specifically, data may be transferred to recipients in the following categories:

- Subjects providing management services for the computer system and communication networks of the International University of languages and Media IULM (including the e-mail service);
- University offices, e.g. Departments, structures in charge of communications;
- Firms or Companies providing assistance and consultancy services;
- Authorities of competent jurisdiction, for the fulfilment of legal obligations, on request;
- Certified bodies, when checking the self-certifications provided in compliance with DPR 445/2000;
- Local bodies, for the purpose of granting subsidies for particular categories of Ph.D students;
- Government Legal Service, Ministry of Foreign Affairs, Police Headquarters, Embassies, Public Prosecutor's Office regarding residence permits, recognition of special statuses;
- Insurance companies, for the processing of accident claims;
- affiliated health facilities (e.g. in the event of accidents);
- Regional Management Bodies (Bodies endowed with administrative-management autonomy established according to the regulations in force on the right to university studies) and other institutions to promote international Ph.D student mobility, for the purpose of assessing the economic benefits and allocating housing;
- Internal Revenue Service, for the filing of income tax returns with the 730 form;
- Ministry of Education, Universities and Research (MIUR);
- CINECA;
- ANVUR;
- ALMALAUREA;



- Public and private subjects, to allow Ph.D. students to benefit from benefits, subsidies and services. In order to promote students' integration in the territory and the university environment, data concerning exchange students may be communicated to outside entities, institutions or associations;
- Sponsors of prizes, doctoral scholarships and grants, including foreign ones, in the case of Ph.D. students who have benefited from funding;
- Foreign universities involved in training courses with the issue of joint degrees;
- Prison services;
- For administrative and accounting purposes, the data may be transmitted to commercial information companies for the evaluation of solvency and payment habits and/or to subjects for debt collection purposes;

Subjects belonging to the abovementioned categories shall become the Data Processors, or shall operate in a completely autonomous way, as Data Controllers in their own right. The list of designated Data Processors is constantly updated and is available at the **International University of languages and Media IULM** main office.

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

Personal data **may be transferred** abroad, inside or outside the European Union, within the limits of and in compliance with the conditions of articles 44 and ff. of EU Reg. 2016/679, in particular:

- to third countries or international organisations whose adequacy was established by a decision of the Commission (art. 45 of EU Reg. 2016/679);
- to third countries or international organisations that provided appropriate safeguards and on condition that enforceable data subject rights and effective legal remedies for data subjects are available (Art. 46 of EU Reg. 2016/679);
- to third countries or international organisations, on the basis of derogations for specific situations (art. 49 of EU Reg. 2016/679).
- Data shall be transferred to:
- to Authorities abroad, upon request, in the event that it is necessary to verify the qualification for professional reasons or for the continuation of studies;
- to Embassies abroad, even for exemptions, for example in the case of military service;
- to companies/networks in the case of traineeships abroad;
- in the case of international students, to the universities abroad, also outside the EU, they come from;

Interested parties may obtain a copy of such data by sending an e-mail to the following address: privacy@iulm.it.

5. STORAGE PERIOD OR CRITERIA

Data shall be processed automatically and/or manually, 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. In particular, the storage of personal data is unlimited in case of students admitted to Ph.D. courses and for a period of 10 years in case of no admitted students. The results and rankings will be published on the University Portal for a maximum period of 3 months.

6. PROVISION AND REFUSAL OF PERSONAL DATA

Provision of personal data for the purposes of paragraph 2 of this policy is necessary in order to manage the information activities described above and connected with Ph.D. students' education and training. Any failure to provide relevant personal data shall entail the impossibility to manage the activities mentioned in paragraph 2 hereof.

7. RIGHTS OF THE DATA SUBJECTS

Data Subject can exercise his rights under articles 15, 16, 17, 18, 19, 20, 21 and 22 of EU Regulation 2016/679 by writing to the Data Controller, the Data processor or the Data Protection Officer at the following address: privacy@iulm.it

Data Subject has the right to obtain, at any moment, from the Controller, access to his personal data, and his rectification or erasure, as well as the restriction of his processing. Moreover, he has the right to object to the processing of his data (including automated processing, such as, for instance, profiling) and to receive the personal data concerning him. Without prejudice for any other administrative and jurisdictional recourse, if Data



Subject believes that the processing of his personal data violates the provisions of EU Reg. 2016/679, he has 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 his consent to the processing at any time.

In case of a request for data portability, the Data Controller shall provide personal data 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: 2 November 2021