

### PERSONAL DATA NOT OBTAINED FROM THE DATA SUBJECT AND USED FOR INFORMATION AND PROMOTIONAL PURPOSES art. 14 EU Reg. 2016/679- GDPR

In compliance with EU Regulation 2016/679 (GDPR) and subsequent variations, here are necessary information regarding the processing of personal data you have provided to third parties and transferred, with your consent, to the IULM University.

#### 1. DATA PROCESSORS

The DATA CONTROLLER pursuant to articles 4 and 24 of EU Reg. 2016/679 is IULM University, with headquarters in Via Carlo Bo 1 - 20143 Milan, in the person of its pro-tempore legal representative.

IULM 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.TYPE OF DATA PROCESSED

Common personal data, in particular: name, surname, birth year, city of origin, email address, telephone number, area of study.

## 3. SOURCES FROM WHICH THE DATA ORIGINATE

IULM University has acquired your data, with your prior consent, from partners operating in the education sector, such as managers of online social learning networks for students; platform managers through which it is possible to share and download study materials; site managers that publish news and information aimed at students; entities operating in the university guidance sector; companies that manage student communities; companies that provide online promotion and marketing services.

### 4. PURPOSE AND LAWFULNESS OF PROCESSING

Personal data will be processed lawfully, in compliance with the provisions of art. 6, par. 1, lett. a) of EU Reg. 2016/679, for the following purpose:

- with prior consent and until objection, sending communications - via e-mail and/or newsletters - relating to events and initiatives promoted by IULM University.

## 5. DATA RECIPIENTS OR RECIPIENT CATEGORIES

The supplied personal data may be transferred to the recipients mentioned in art. 28 and in art. 29 of EU Reg. 2016/679, who will 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:

- authorities of competent jurisdiction, for the fulfilment of legal obligations, on request;
- entities carrying out maintenance on the information system and the data collection platform;
- authorized persons within the Data Controller organization.

Subjects belonging to the abovementioned categories will become the Data Processors, or will 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 IULM University main office.

## 6. DATA TRANSFER TO THIRD COUNTRIES AND/OR INTERNATIONAL ORGANISATIONS

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

## 7. STORAGE PERIOD OR CRITERIA

Data will 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, however for a maximum period of 10 years.



# 8. RIGHTS OF THE DATA SUBJECTS

You shall be able to exercise your 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

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 right to object to the processing of your data (including automated processing, such as, for instance, profiling) and 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. 016/679.

Updated on: December 10<sup>th</sup> 2020