PARTICIPATION IN CALLS FOR APPLICATIONS FOR INTERNATIONAL MOBILITY

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

1. DATA CONTROLLER AND DATA PROTECTION OFFICER

The DATA CONTROLLER, pursuant to Articles 4 and 24 of Regulation (EU) 2016/679, is Libera Università di Lingue e Comunicazione IULM, located at Via Carlo Bo n. 1 – 20143 Milan, in the person of its pro-tempore legal representative.

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

2. SUBJECT MATTER OF THE PROCESSING

The following data are subject to processing:

1. personal, identification, and contact details (name, surname, date and place of birth, tax code, residence, citizenship), identity document, passport-sized photograph, visas/residence permits for non-EU students, bank details for the payment of mobility grants;
2. data relating to previous and current studies;
3. special categories of personal data (pursuant to Article 9, paragraph 2, letter g) of Regulation (EU) 2016/679), such as health status (for students with disabilities) for access to additional funding specifically provided for by international mobility programmes.

3. PURPOSES OF THE PROCESSING AND LEGAL BASIS

a) Purposes based on public interest pursuant to Article 6(1)(e) and Article 9(2)(g) of Regulation (EU) 2016/679:

- processing relating to health status (for students and staff with disabilities) for access to additional funding specifically provided for by international mobility programmes;
- processing relating to health status (for students and staff with disabilities) for access to support measures and tools, where provided for, at host institutions.

b) Contractual purposes pursuant to Article 6(1)(b) of Regulation (EU) 2016/679

- verification of compliance with the requirements for participation in the selection procedure for admission to international mobility programmes and the absence of grounds precluding participation;
- determination of scores and ranking positions;
- management of procedures for the recognition of credits earned abroad;
- calculation of international mobility grant amounts;
- sending communications relating to the student's university career.

c) Legal obligation purposes pursuant to Article 6(1)(c) of Regulation (EU) 2016/679

- application of workplace health and safety measures in accordance with the provisions of Legislative Decree no. 81/2008;
- archiving and retention of data relating to the university career (studies carried out during the mobility period);
- participation in competitive selection procedures to obtain individual on-demand services provided by the University;
- processing of judicial data.

4. METHODS OF PROCESSING AND NATURE OF DATA

The data will be processed both in paper form and by electronic means, including networked systems, by authorised staff of IULM University in such a way as to ensure their security.

The provision of data for the purposes referred to in paragraphs a), b), and c) of Section 3 is necessary in order to access the selection procedures for international mobility programmes and to administratively manage the preparation, implementation, and conclusion phases of international mobility periods, the academic career, and the provision of services, except for the provision of data relating to students and persons with disabilities referred to in paragraph a), which is optional, although failure to provide such data will result in the impossibility of accessing additional funding specifically provided for by international mobility programmes or benefiting from specific measures and support tools at host institutions, where available.

5. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA

The personal data provided may be disclosed to third-party recipients who will process the data as Data Processors pursuant to Article 28 of Regulation (EU) 2016/679, or who will operate in full autonomy as separate Data Controllers.

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

- competent internal structures of the University;
- entities providing services for the management of the information system and communication networks;
- public and private entities to enable students to benefit from allowances, subsidies, and services, such as funding bodies, credit institutions, and insurance companies;
- in order to promote their integration into the local community and university environment, data relating to exchange students may also be disclosed to bodies, institutions, or associations.

6. TRANSFER OF DATA TO A THIRD COUNTRY AND/OR AN INTERNATIONAL ORGANISATION

The personal data provided may be transferred to countries outside the European Union to enable the administrative and academic management of international mobility programmes at partner host universities.

The transfer takes place in compliance with the conditions and safeguards set out in Chapter V of Regulation (EU) 2016/679, and in particular:

- to third countries for which the European Commission has adopted an adequacy decision pursuant to Article 45 of Regulation (EU) 2016/679;
- to third countries without an adequacy decision, subject to the signing with the partner university of Standard Contractual Clauses (SCCs) approved by the European Commission pursuant to Article 46(2)(c) of Regulation (EU) 2016/679 (Module 1: Controller-to-Controller);
- in the absence of the safeguards mentioned above, the transfer may take place on the basis of the derogations for specific situations referred to in Article 49 of Regulation (EU) 2016/679 (e.g., for the performance of a contract between the student and the University or with the explicit consent of the data subject).

The updated list of safeguards applied for individual destinations and a copy of the relevant Standard Contractual Clauses (SCCs) may be requested by sending a communication to the Data Controller at privacy@iulm.it.

7. RETENTION PERIOD OR CRITERIA

As these data have already been provided for enrolment purposes, they will be retained in accordance with Article 14 of MIUR Decree no. 45 of 08/02/2013 (Official Gazette no. 104 of 06.05.2013), and IULM may use them for the purposes indicated in this privacy notice for a period of ten years, subject to any intervening changes in the European and national legislation establishing such obligations.

8. RIGHTS OF THE DATA SUBJECTS

At any time, by sending an email to privacy@iulm.it, data subjects may exercise their rights pursuant to Articles 15, 16, 18, 19, 20, 21, and 22 of Regulation (EU) 2016/679 regarding access, rectification, erasure (without prejudice to data that must be retained by the University by law), restriction of processing, data portability, and objection to the processing of their data.

Without prejudice to any other administrative or judicial remedy, should the data subject consider that the processing of their personal data infringes Regulation (EU) 2016/679, pursuant to Article 15(1)(f) of the aforementioned Regulation (EU) 2016/679, they have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) and, with reference to Article 6(1)(a) and Article 9(2)(a), to withdraw their consent at any time.

In the event of a request for data portability, the Data Controller will provide the personal data in a structured, commonly used, and machine-readable format, without prejudice to paragraphs 3 and 4 of Article 20 of Regulation (EU) 2016/679.

Last updated: 23 October 2026