



## **LIBRARY SERVICES**

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 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](mailto:dpo.iulm@dpoprofessionalservice.it).

### **2. PURPOSE AND LAWFULNESS OF THE TREATMENT**

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

- Allow access to the services offered by the library system (consultation and loan of bibliographic and documentary assets on paper and electronic support, interlibrary loan and document delivery, reference).

### **3. 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 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:

- authorized persons within the Data Controller organization
- entities carrying out maintenance on the information system and the data collection platform;
- entities that provide tools for self-service collection of material (lockers in use at the Library).

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 to non-EEA countries on the basis of articles 44 et seq. of EU Regulation 2016/679.

### **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 personal data of external users of the Library are deleted immediately after the return of the bibliographic or documentary material consulted. The personal data of students, teachers and staff are stored in accordance with legal obligations. The data concerning the material consulted or borrowed by students, teachers and staff are anonymized at the time of graduation or the termination of the employment relationship.

### **6. PROVISION AND REFUSAL OF PERSONAL DATA**

The provision of personal data for the purposes referred to in point 2 of this information document is necessary for access to library services on request. Failure to provide personal data will make it impossible to provide the services requested.



## **7. RIGHTS OF THE DATA SUBJECTS**

You shall be able to exercise your rights under articles 15, 16, 17, 18, 19, 21 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](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 right to object to the processing of your data. 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.

*Update date: 3 February 2025*