



NAVIGATION AND REGISTRATION ON THE PORTAL “www.iulm.com”

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.

2. DATA PROCESSED

A) Data provided voluntarily by users / visitors

Common personal data, such as eg. name, surname, email address, provided while browsing the site in order to access certain services (for which reference is made in specific information notices) or to make requests via e-mail;

B) Navigation data

The computer systems and software procedures, used to operate this website, acquire, in the course of their normal exercise, some personal data whose transmission is implicit in the use of communication protocols of the Internet. This category of data includes IP addresses or domain names of the computers and terminals used by users, addresses in URI / URL (Uniform Resource Identifier / Locator) notation of the requested resources, the time of request, the method used to submit the request to the server, the size of the file obtained in response, the code numeric indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the system operational and the user's IT environment. These data are used for the sole purpose of obtaining anonymous statistics on the use of the site and to check its correct functioning.

As regards the use of cookies, while browsing the site, please refer to the Cookie Policy, published on site itself.

3. PURPOSE AND LAWFULNESS OF THE TREATMENT

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

- A. pursuant to art. 6, par. 1 letter b) - carrying out the operations strictly necessary for the purpose of proceed with the provision of any services requested, including browsing the pages of the site and the creation of a registration account for the use of the Online Services;
- B. statistical processing of aggregate data in relation to the performance of the site (being data anonymised, i.e. data from which it is not possible to re-identify, even indirectly, a physical person, such data are no longer personal data, therefore the relative treatments are subtracted from the application of the privacy legislation and a particular legal basis is not necessary);
- C. pursuant to art. 6, par. 1 letter a) - evaluations regarding the use of the site by users;
- D. pursuant to art. 6, par. 1 letter a) - response to requests for information and/or sending of informative and promotional material regarding the educational offer or events and initiatives promoted by the IULM University;
- E. pursuant to art. 6, par. 1, letter c) - the data could be used to ascertain responsibility in case of hypothetical computer crimes against the site.

On the pages of the site, where your personal data are explicitly collected, you will find the further specific privacy policies, as well as the methods for acquiring your consent in cases where the owner uses this legal basis for processing.

4. 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:

- 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 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.

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

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

6. 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 this regard, reference is made to what is indicated in the specific information notices present in the various sections of the site. The navigation data, used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning, are deleted immediately after processing. The data acquired for sending information and promotional material may be kept up to 10 years (Codau Guidelines) in consideration of the duration of the three-year and master degree courses.

7. PROVISION AND REFUSAL OF PERSONAL DATA

The provision of personal data for the purposes A) of this information document is necessary in order to receive feedback from the Data Controller regarding the services requested and to browse the site. Failure to provide personal data will make it impossible to provide the requested services and the inability to browse the site. The provision of personal data for purposes C) and D) is discretionary, even though the failure to provide such data shall entail the impossibility to evaluate your browsing experience and send you promotional material relating to events and initiatives organised by the Data Controller, without prejudice to the purpose A).

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.