



## ENROLLMENT PRIVACY POLICY

### Privacy policy for the processing of personal data collected and processed in connection with the University enrollment process

In compliance with the EU Regulation 2016/679, General Data Protection Regulation ("GDPR"), we are hereby providing you with the necessary information regarding the processing of the personal data you have provided. This information is provided pursuant to Article 13 of the EU Reg. 2016/679.

**DATA CONTROLLER**, pursuant to Articles 4 and 24 of EU Reg. 2016/679 is LUMSA Libera Università Maria Ss. Assunta, with headquarters in Via della Traspontina, 21 - Rome, in the person of the special attorney. Contact details of the data controller: [privacy@lumsa.it](mailto:privacy@lumsa.it)

#### DATA PROTECTION OFFICER (RPD/DPO)

The Society has also appointed a Data Protection Officer (RPD/DPO) pursuant to articles 37 - 39 of EU Reg. 2016/679 whose contact details are as follows: email [dpo.lumsa@dpoprofessionalservice.it](mailto:dpo.lumsa@dpoprofessionalservice.it)

#### TYPE OF DATA PROCESSED

Definitions:

- 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person - art. 4, p. 1 GDPR.
- 'categories of special data' personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, [...] genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation - art. 9, p. 1 GDPR.
- 'personal data relating to criminal convictions and offences or related security measures' - art. 10 GDPR.

We inform you, pursuant to EU Regulation 2016/679, that the personal data acquired by the Data Controller in compliance with the legislative and contractual provisions in force, will be processed in accordance with the aforementioned legislation and confidentiality obligations.

Data 'Processing' means: "any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction". Data subject should be considered to be: an "identified or identifiable natural person".

<b>Processing propose</b>	<b>Lawfulness</b>	<b>Data retention period</b>	<b>Nature of the provision and refusal</b>
<b>A) Degree program enrollment and management of the course of study</b>  - elaboration of the contribution bracket proportional to income, calculation of	Art. 6, parr. 1, lett. e), 3, lett. b) and 9, par. 2, lett. g) of the GDPR and	Art. 1 ministerial decree of 30 May 2001 (O.G. 175 of 30	The conferment is necessary in order to perform a task of public interest for the University.



<p>the amount of taxes due, management of any practices relating to applications for exemption from payment of university fees, registration in calls for tenders or request for other services and / or interventions for the right to university study, such as the granting of benefits and / or any concessions provided for by law);</p> <ul style="list-style-type: none"> <li>- management of your university career and related activities (study plan management, enrollment and attendance of university courses, registration of exams, use of telematic and e-mail services, sending communications related to their university career);</li> <li>- Preparatory activities and related to the awarding of the degree (application for graduation and/or suspension of career, verification of the authenticity of the assignments / theses prepared by undergraduates, conduct of the discussion, awarding of the title and related legal requirements).</li> </ul>	<p>articles 2-ter and 2-sexies of the Privacy Code: performance of a task of public interest in the field of education and training in the university.</p> <p>Art. 6 par. 1 lett. c) GDPR Law No. 475 of April 19, 1925 on "Repression of the false attribution of others' work by aspirants to the conferment of degrees, diplomas, offices, titles and public dignities."</p>	<p>July 2001) "Identification of essential student career data"</p>	
<p><b>B) Enrollment in university and non-university masters</b></p> <ul style="list-style-type: none"> <li>- management of the educational and administrative relationship between the University and students, as well as the provision of specific services requested by users;</li> <li>- participation in calls for applications for doctorates and for the subsequent management of the educational path.</li> </ul>	<p>Art. 6 par. 1 lett. b) GDPR Execution of contractual measures.</p>	<p>Art. 1 ministerial decree of 30 May 2001 (O.G. 175 of 30 July 2001) "Identification of essential student career data"</p>	<p>The conferment of data is necessary for the purpose of the conclusion of the contract between the parties and for the purpose of the management of the fulfillment of administrative/accounting obligations always with respect to the existing contract, the denial of the conferment will not allow the conclusion of the contract between you and the University.</p>
<p><b>C) fulfilments required by law</b></p>	<p>Art. 6 par. 1 lett. c) GDPR</p>	<p>Art. 1 ministerial decree of 30</p>	<p>The conferment is mandatory. Failure to provide it will make it</p>



<p>- formalities required for the management of the teaching and administrative relationship between LUMSA University and students.</p>	<p>Compliance with a legal obligation.</p>	<p>May 2001 (O.G. 175 of 30 July 2001) "Identification of essential student career data"</p>	<p>impossible for the data controller to fulfill legal obligations.</p>
<p><b>D) online teaching</b></p> <p>- continuation of the training activity and delivery of teaching through online methods: organization of lessons and conducting them through interactive class activities (live viewing of participants, sharing of content by the teacher, feedback to questions, e.g.). The Athenaeum, in the context of online teaching, will broadcast the lessons in live streaming in order to allow students who do not follow the teaching in person to use them.</p>	<p>Art. 6, parr. 1, lett. e), 3, lett. b) and 9, par. 2, lett. g) of the GDPR and articles 2-ter and 2-sexies of the Privacy Code: performance of a task of public interest in the field of education and training in the university. The online mode allows the continuation of the institutional activity of the university and the performance of training activities, promotion of study and culture.</p>	<p>The processed data will be transmitted in live streaming mode. Such personal data will therefore not be stored beyond the end of the teaching session with exclusive reference to the streaming of the lesson.</p>	<p>Conferment is necessary in order to perform a task of public interest for the University.</p>
<p><b>E) management of internships</b></p> <p>- management of internships, both curricular and extra-curricular, and related activities (eg. signing of agreements) and assistance for entering the world of work.</p>	<p>Art. 6, parr. 1, lett. e), 3, lett. b) and 9, par. 2, lett. g) of the GDPR and articles 2-ter and 2-sexies of the Privacy Code: performance of</p>	<p>Art. 1 ministerial decree of 30 May 2001 (O.G. 175 of 30 July 2001) "Identification of essential student career data"</p>	<p>Conferment is necessary for the use of job placement support services. In case of failure to confer, the student will not be admitted to internships.</p>



	a task of public interest in the field of education and training in the university.		
<p><b>F) recording of the lessons</b></p> <p>- the teacher's lessons delivered in online teaching mode, will be recorded and uploaded on the Google Drive LUMSA platform with limited access, and in the reserved section of the LUMSA e-learning portal, with the aim of making the contents available to students even at later times.</p>	<p>Legitimate interest of the data controller Art. 6 par. 1 lett. f) GDPR</p>	<p>The data contained in the registrations uploaded to the e-learning portal will be kept for 10 years.</p>	<p>Conferment is necessary with regard to the recording of lessons delivered through online teaching. The University, through lessons recording, makes the content usable to students even at later times.</p>
<p><b>G) marketing</b></p> <p>- third party marketing (partners who have an agreement with LUMSA) consisting in sending e-mails containing promotional communications on the services offered by the Athenaeum partner. This activity does not provide for the transfer of data by LUMSA to the partner.</p>	<p>Art. 6 par. 1 lett a) GDPR Consent of the data subject.</p>	<p>Until your opposition.</p>	<p>With regard to Marketing activities on behalf of third parties (partners of LUMSA), the data subject has the right to object at any time to the processing of data. Even subsequent opposition to these e-mail communications will not affect the contract.</p>
<p><b>H) management and implementation of disciplinary measures against students</b></p>	<p>Art. 6 par. 1 lett. c) GDPR Compliance with a legal obligation. Art. 16 RDL 1071/1935.</p>	<p>- Unlimited, for the final provision; - 5 years for revoked or cancelled measures.</p>	<p>The conferment is mandatory. Failure to provide it will make it impossible for the data controller to fulfill legal obligations.</p>
<p><b>I) sending Newsletter</b></p> <p>- sending newsletters containing Athenaeum service communications and information material regarding university courses held by the LUMSA University (promotion of the educational offer), orientation and training events for the continuation of the university career.</p>	<p>Legitimate interest of the data controller Art. 6 lett. f) GDPR - soft spam  Information activities by e-mail to the e-mail address</p>	<p>Until your opposition.</p>	<p>With regard to Soft Spam activity, the data subject has the right to object to the processing of data at any time. Even subsequent opposition to these e-mail communications will not affect the contract.</p>



	<p>provided during registration and enrollment. Promotion and development of the training offer with regard to the relationship already in place between the owner and the interested party, also assessed with respect to the reasonable expectation of the interested party to receive such communications in order to stay informed about the advancement of university career.</p>		
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### RECIPIENTS

In order to comply with existing contracts or related purposes, your data will be shared with third parties belonging to the following categories:

- subjects who finance the studies of the data subject, including subjects with parental responsibility (as referred to in Title IX of the Civil Code), who sustain the data subject's studies through the payment of university fees;
- subjects, based in Italy, that provide services for the management of the information system used by LUMSA Libera Università Maria Ss. Assunta and the telecommunications networks;
- studies or companies, based in Italy, in the context of assistance and consultancy relationships;
- subjects that provide services for the management of the activities indicated above in the purposes;
- platform managers for the services listed above (e.g., website hosting);
- third parties such as private companies and organisations affiliated to the University;
- Competent authorities for compliance with legal obligations and / or provisions of public bodies, upon request.

The subjects belonging to the previously mentioned categories act as data Processors or act in complete autonomy as separate data Controllers. The list of designated data Processors is constantly updated and available at the Athenaeum.



## **DATA TRANSFER TO A THIRD COUNTRY AND/OR INTERNATIONAL ORGANISATION**

Personal data will only be transferred outside EEA (European Economic Area) to a third country and/or an international organisation in the cases identified below. The data will be transferred:

- to Authorities abroad, upon request, if it is necessary to verify the qualification for professional reasons or for the continuation of studies;
- to embassies abroad, also for exemptions, for example in the case of military service;
- to non- EEA universities, in the context of international exchanges for in-going and outgoing students;
- to companies/bodies in the case of internships abroad;
- in the case of international students, to universities abroad, also from extra EEA, where the student comes from.

The transfer is based on art. 49 "derogations in specific situations" paragraph 1 letter b) and c) that is:

- Letter b): transfer necessary for the execution of a contract between the interested party and the data controller;
- Letter c): transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person.

In the context of online teaching, the transfer of data outside EEA takes place according to the tool used. The chosen suppliers have data centers also located outside the EEA. The Data Controller then assessed the conditions underlying the data transfer and the related guarantees, through the analysis of contracts and information such as security certifications provided by the service providers in question. Google LLC Mountain View, California 94043 has made available on its platform the SCC, Standard Contractual Clauses for the use of the components of GSuite - Workspace. You are free to request further information by contacting the data controller at [privacy@lumsa.it](mailto:privacy@lumsa.it).

## **DATA SUBJECT'S RIGHT**

You may assert your rights as expressed by the EU Regulation 2016/679 at art. 15 et seq. by contacting the Data Controller by writing to [privacy@lumsa.it](mailto:privacy@lumsa.it) or to the Data Protection Officer | Data Protection Officer ex art. 38 paragraph 4, by writing to the email address [dpo.lumsa@dpoprofessionalservice.it](mailto:dpo.lumsa@dpoprofessionalservice.it) or to the PEC address [dpo.lumsa@pec.dpoprofessionalservice.it](mailto:dpo.lumsa@pec.dpoprofessionalservice.it).

You have the right, at any time, to ask the Data Controller for access to your personal data, their rectification, cancellation and restriction of processing. You have the right to withdraw your consent at any time. In the cases provided for, you have the right to the portability of your data and in this case the Data Controller will provide you with your personal data in a structured format, commonly used and readable, by automatic device.

Furthermore, you have the right to object, at any time, to the processing of your data. To stop receiving marketing communications, it will be sufficient to write an e-mail to [privacy@lumsa.it](mailto:privacy@lumsa.it) at any time with the subject "cancellation from automated" or use our automatic cancellation systems provided for e-mails only. Without prejudice to any other administrative and jurisdictional appeal, if you believe that the processing of data concerning you violates the provisions of EU Reg. 2016/679, you have the right to lodge a complaint with the Guarantor for the protection of personal data.

## **MODIFICATION OF THE PRIVACY POLICY**

The Data Controller reserves the right to modify, update, add or remove portions of this privacy policy at its sole discretion and at any time. In order to facilitate such verification, the policy will contain an indication of the date of updating.

*Upgrade date: April 4, 2023*