



PRIVACY POLICY

Information for the processing of personal data

According to Regulation (EU) 2016/679 (General Data Protection Regulation) we provide you with the due information concerning the processing of the collected personal data. This privacy policy is given pursuant to art. 13 GDPR.

DATA CONTROLLER, pursuant to art. 4 and 24 of the Reg. (EU) 2016/679, is **LUMSA Libera Università Maria Ss. Assunta**, registered office in Via della Traspontina, 21 – Roma, represented by the special attorney. Contact details of the data controller: privacy@lumsa.it.

DATA PROTECTION OFFICER (DPO) - The company has appointed the Data Protection Officer (DPO) pursuant to art. 37-39 of the Reg. UE 2016/679 whose contact is: e-mail dpo.lumsa@dpoprofessionalservice.it

Processing propose	Lawfulness	Data retention period
A) Enrollment in degree courses: - elaboration of the contribution bracket proportional to income, calculation of 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); - management of your university career and related activities (study plan management, registration of exams, graduation application and / or career suspension, enrollment and attendance of university courses in person, use of telematic and e-mail services, sending communications related to their university career).	Art. 6 par. 1 lett. b) GDPR Execution of contractual measures.	Art. 1 ministerial decree of 30 May 2001 (O.G. 175 of 30 July 2001) "Identification of essential student career data"
B) Enrollment in university and non-university masters: - management of the educational and administrative relationship between the University and students, as well as the provision of specific services requested by users; - participation in calls for applications for doctorates and for the subsequent management of the educational path.	Art. 6 par. 1 lett. b) GDPR Execution of contractual measures.	Art. 1 ministerial decree of 30 May 2001 (O.G. 175 of 30 July 2001) "Identification of essential student career data"
C) fulfilments required by law: - formalities required for the management of the teaching and administrative relationship between LUMSA University and students.	Art. 6 par. 1 lett. c) GDPR Compliance with a legal obligation.	Art. 1 ministerial decree of 30 May 2001 (O.G. 175 of 30 July 2001) "Identification of essential student career data"
D) online teaching: - 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	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	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



students who do not follow the teaching in person to use them.	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.	exclusive reference to the streaming of the lesson.
E) management of internships: - management of internships, both curricular and extra-curricular, and related activities (eg. signing of agreements) and assistance for entering the world of work.	Art. 6 par. 1 lett. a) GDPR Consent of the data subject.	Until your opposition.
F) recording of the lessons: - 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.	Legitimate interest of the data controller Art. 6 par. 1 lett. f) GDPR	The data contained in the registrations uploaded to the e-learning portal will be kept for 10 years.
G) marketing: - 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.	Art. 6 par. 1 lett a) GDPR Consent of the data subject.	Until your opposition.
H) management and implementation of disciplinary measures against students.	Art. 6 par. 1 lett. c) GDPR Compliance with a legal obligation. Art. 16 RDL 1071/1935.	- Unlimited, for the final provision; - 5 years for revoked or cancelled measures.
I) sending Newsletter: - 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.	Legitimate interest of the data controller Art. 6 lett. f) GDPR - soft spam Information activities by e-mail to the e-mail address 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	Until your opposition.



	interested party to receive such communications in order to stay informed about the advancement of university career.	
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NATURE of PERSONAL DATA CONFERRAL

- Purposes A), B) – Conclusion of a contract (Athenaeum and Student): the provision of data is necessary for the purpose of stipulating the contract between the parties and for the management of the fulfillment of administrative / accounting obligations, always with respect to the existing contract, the refusal of the provision is not will allow the conclusion of the contract between you and the Athenaeum.
- Purposes C) and H) – Legal obligation: the provision is mandatory. Failure to provide the data will make it impossible for the owner to comply with the law.
- Purposes D) Online teaching: the provision is necessary, as it is essential for the Athenaeum in order to continue the teaching activity. Failure to provide it will make it impossible to participate in teaching.
- Purpose F) With regard to the registration of lessons delivered through online teaching, the conferment is necessary in order to pursue the legitimate interest of the Athenaeum which, by recording the lessons, makes the contents accessible to students even at subsequent times.
- Purpose E) – Management of internships: the provision is free. Failure to provide the personal data will make it impossible to provide support services to help you integrate into the world of work.
- Purpose I) – Soft Spam: with regard to the activity of Soft Spam, the interested party has the right to object to the processing of data at any time. The opposition even after these e-mail communications will not affect the contract.
- Purpose G) – Third party marketing: with regard to third party marketing (partner of LUMSA), the interested party has the right to object to the processing of data at any time. The opposition even after these e-mail communications will not affect the contract.

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 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 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);
- 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 extra SEE to a third country and/or an international organisation in the cases identified below. The data will be transferred:



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- 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- SEE 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 SEE, 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;

(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 SEE takes place according to the tool used. The chosen suppliers have data centers also located outside the SEE. 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. The data transfer therefore takes place in compliance with articles 44 and ff. of EU Regulation 2016/679. You are free to request further information by contacting the data controller at privacy@lumsa.it.

DATA SUBJECT'S RIGHT

You may exercise your rights as indicated by the art. 15 and ff. in the Regulation EU 2016/679, by contacting the data Controller, sending an e-mail to privacy@lumsa.it or by phone: 06 684 221. You have the right, at any time, to ask the Data Controller to access your personal data, to rectify, cancel them, to regulate the processing.

Furthermore, you have the right to object, at any time, to the processing of your data for the purposes referred to in letters D), F) and I) of the information. To stop receiving marketing communications, referred to in letter G), it will be sufficient to write an e-mail to 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, pursuant to art. 15 letter f) of the aforementioned EU Reg. 2016/679, you have the right to lodge a complaint with the Guarantor for the protection of personal data. 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.

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: 1 October 2021