



## INFORMATION NOTICE FOR USERS OF THE STUDENT ADMINISTRATION OFFICE ON PROCESSING OF PERSONAL DATA

### Preamble

As provided by art. 13 of EU 2016/679 Regulations and art. 13 of the legislative decree no. 196/2003, the University of Milan informs users of the Student Administration Office (aspiring students, students enrolled in degree programmes, graduates) regarding use of their personal data. The University of Milan continues to observe the laws on transparency and freedom of information.

### 1. The data controller and Data Protection Officer (DPO)

The data controller for the University of Milan is the Rector, Via Festa del Perdono n. 7, 20122 - Milan, e-mail [infoprivacy@unimi.it](mailto:infoprivacy@unimi.it).

Pursuant to art. 37 and following of EU 2016/679 Regulations, the University appointed as Data Protection Officer (DPO) Dr. Pierluigi Perri, Via Festa del Perdono n. 3, 20122 - Milan, e-mail [dpo@unimi.it](mailto:dpo@unimi.it).

### 2. Purposes and legal basis of the processing

Personal data obtained and processed by the Student Administration Office is:

- a) data provided directly by users on registration for admission exams for study programmes, on application for economic aid and benefits, on enrolment and during the whole University career;
- b) data related to the economic situation of the student's family provided by the ISEE/ISEEU certifications for the payment of university fees and for the admission to economic aid and benefits based on specific income requirements;
- c) data provided from time to time by users in relation to services requested;
- d) data on university career;
- e) data provided on enrolment in state examinations conducted at the University of Milan.

This data is processed exclusively to pursue the institutional aims of the University, in particular to fulfil its legal role in managing teaching and administrative relations between the University and students, as well as for providing specific services requested by users.

The supply of data is necessary to establish the relationship between students and University and to provide services requested by users. Failure to provide the data indicated in section 2 at points a), b), d) and e) precludes establishment and continuation of a relationship with the University. Failure to provide the data indicated at point c) prevents access to the services requested.

### 3. Methods of data processing

The data collected observes the principles of relevance, completeness and non excessiveness in relation to the purposes for which it is processed. The personal data provided is processed observing the principles of lawfulness, fairness and transparency envisaged by the law, also with



the aid of information technology for data storage and management, and in any case so as to ensure its security and fully protect the privacy of the persons concerned.

The data may be processed in anonymous form for statistical analysis aimed at improving the services offered.

#### **4. Categories of subjects to whom data can be communicated or who might come into possession of same and eventual data transfer abroad**

Users' personal data will be processed by university employees of the Student Administration Office (appointed of the treatment) in accordance with relevant current regulations.

Data can be communicated:

- a) to University structures requiring it for institutional purposes or in observation of the legislative obligations;
- b) to non-economic public subjects or consortia to which the University belongs when communication is necessary to carry out the institutional functions of the requesting body;
- b) to external subjects identified as responsible for processing (firms that manage admission tests to study programmes);
- c) to public and private subjects who apply for the purpose of facilitating the orientation, education and professional integration of students and graduates of the University;
- d) to the bank that manages services connected with the card provided at enrolment, which processes the data as autonomous data controller and supplies the persons concerned with the information notice on the processing of the data assigned to it.

Sensitive and legal data can be communicated for the purposes of section 2 only where provided for by laws and regulations, except for data legitimately requested by the public security authority, the judicial authority or other public subjects for the purposes of defence, security of the State and investigation of crimes, as well as communication to the judicial authority as provided by law, where crime is suspected.

Except in these cases, personal data is never communicated or disseminated to third parties in any form or in any way.

#### **5. Length of the data retention**

Personal data contained in student's dossier, in ranking lists, in minutes of the admission tests and in decrees regarding students and graduates will be retained by the University of Milan for an unlimited period of time. Personal data contained in paper documents of admission tests will be instead retained for 5 years.



## 6. Rights of persons concerned

According to art. 15 and following of EU 2016/679 Regulations and to art. 7 of Leg. Decree 196/2003 the interested parties have the following rights:

- Right of access: right to obtain from the data controller the confirmation that a treatment of personal data concerning themselves is in process and, in that case, to obtain access to the information specified in art. 15 of the General Data Protection Regulation;
- Right to rectification: right to obtain from the data controller the rectification of wrong personal data concerning themselves, without delay, and the integration of the incomplete data, also providing an additional declaration;
- Right to erasure: right to obtain from the data controller the erasure of personal data concerning themselves, without delay, in cases where the reasons specified in art. 17 of the General Data Protection Regulation exist;
- Right of processing limitation: right to obtain from the data controller the limitation of data processing, if one of the events specified in art. 18 of the General Data Protection Regulation occur;
- Right to data portability: right to receive in a structured and commonly used format, readable from any automatic device, the personal data concerning themselves and the right to transfer that data to another data controller, without hindrance from the controller from whom the personal data are withdrawn, in cases where the reasons specified in art. 20 of the General Data Protection Regulation exist;
- Right to object: right to object at any time, for reasons connected to their particular situation, to the processing of personal data concerning themselves in the cases and with the procedures provided by art. 21 of the General Data Protection Regulation;
- Right to not being subject to a decision based only on an automatic processing, including profiling, that produces juridical effects on them or which affect them significantly, according to the modalities provided by art. 22 of the General Data Protection Regulation.

These rights can be exercised by application to the chief data processor above mentioned.

## 7. Right to lodge a complaint with a supervisory authority

The interested party has the right to lodge a complaint with a supervisory authority in the country of residence or with any supervisory authority in the European Union.



**In relation to the processing of personal data carried out for the performance of the banking services that may be requested with, or connected to, the card, Intesa Sanpaolo S.p.A. shall exclusively be the controller of the data listed below:**

Citizenship, Italian tax code, Surname, Name, Sex

Date of birth, Place of birth

Permanent address and street number, Postal code, Town

Current address and street number, Postal code, Town

Telephone - Mobile

Photo , Identity document

Identity document:, number, issued in.. , by ... , of...

On date, expiring within

Mail address (@unimi.it)

## NOTICE TO NATURAL PERSONS PURSUANT TO ART. 13 AND 14 OF REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL OF 27 APRIL 2016 (HEREINAFTER, THE "NOTICE")

The Regulation on the "protection of natural persons with regard to the processing of personal data and on the free movement of such data" (hereinafter the "Regulation") contains a series of rules aiming to guarantee that the processing of personal data takes place in compliance with the rights and fundamental freedoms of people. This Notice incorporates its requirements.

### SECTION 1 - IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

**Intesa Sanpaolo S.p.A.**, with registered office in Piazza San Carlo 156, 10121 Turin, Parent Company of the Intesa Sanpaolo international Banking Group, in its capacity as Data Controller (the "Bank" or the "Data Controller") processes your personal data (the "Personal Data") for the purposes indicated in Section 3.

For further information, call the freephone number 800303303 or visit the Intesa Sanpaolo website [www.intesasanpaolo.com](http://www.intesasanpaolo.com) and, in particular, the "Privacy" section with all the information concerning the use and processing of Personal Data, the detailed references of each company of the Intesa Sanpaolo Group, the updated information regarding the contacts and communication channels made available to all Data Subjects by the Intesa Sanpaolo Group.

### SECTION 2 - CONTACT DETAILS OF THE DATA PROTECTION OFFICER

Intesa Sanpaolo appointed the "data protection officer" as required by the Regulation (so-called "Data Protection Officer" or DPO). For all matters relating to the processing of your personal data and/or to exercise the rights provided for by the same Regulation, listed in Section 7 of this Notice, you may contact the DPO at the following email address: [dpo@intesasanpaolo.com](mailto:dpo@intesasanpaolo.com)

### SECTION 3 - CATEGORIES OF PERSONAL DATA, SOURCES, PURPOSES AND LEGAL BASIS OF THE PROCESSING

#### Categories of Personal Data

Included among the Personal Data that the Bank processes, by way of example, are personal details, the details acquired from payment instructions, those deriving from the installation and use of the Bank's APPs (including geolocation data, data deriving from web services, etc...). The data processed may also include special categories of data pursuant to Section 8 of this Notice.

#### Sources of Personal Data

The Bank uses the Personal Data that concerns you, which you communicated to the Bank or collected from other Data Controllers (in the latter case subject to checking compliance with the conditions of lawfulness by third parties) or public sources (i.e. the Chamber of Commerce) in compliance with the reference regulations.

#### Purpose and legal basis of the processing

Your Personal Data will be processed by the Bank as part of its activities, for the following purposes:

##### a) Provision of services and execution of contracts

The submission of your Personal Data needed to perform the services requested and execute the contracts (including deeds in a pre-contractual phase) is not mandatory by law, but refusal to provide such Personal Data makes it impossible for the Bank to fulfil requests.

##### b) Complying with the provisions of national and EU legislation

The processing of your Personal Data to comply with regulatory provisions is mandatory and your consent is not required.

The processing is mandatory, for example, when it is required by anti-money laundering, taxation, anti-corruption, fraud prevention regulations in the payment services or to fulfil instructions or requests of the supervisory and control authority (such as monitoring of operating and credit risks at banking group level).

##### c) Direct and indirect marketing and profiling

The processing of your Personal Data,

- to perform activities aimed at the promotion and sale of products and services of companies belonging to the Intesa Sanpaolo Group or third party companies through letters, by telephone, Internet, SMS, MMS and other communication systems;
- to conduct market and customer satisfaction surveys through letters, by telephone, Internet, SMS, MMS and other communication systems;

- to evaluate and predict aspects concerning, among others, interests, preferences, consumption choices and habits, in order to offer increasingly targeted and adequate products and services, in particular through the analysis, processing of your information (for example current account transactions, changes in the financial situation, location and movements) and the identification of categories (clusters)

is optional and your consent is required.

#### **d) Legitimate interest of the Data Controller**

The processing of your Personal Data is necessary to pursue a legitimate interest of the Bank, i.e.:

- to prevent fraud;
- to acquire images and videos relating to the CCTV system for security purposes;
- to pursue any and additional legitimate interests. In the latter case, the Bank may process your Personal Data only after having informed you and having ascertained that achieving its legitimate interests or those of third parties does not compromise your rights and fundamental freedoms and your consent is not required.

#### **SECTION 4 - CATEGORIES OF RECIPIENTS TO WHOM YOUR PERSONAL DATA MAY BE COMMUNICATED**

To achieve the purposes indicated above, it might be necessary for the Bank to communicate your Personal Data to the following categories of recipients:

1) **Companies of the Intesa Sanpaolo Group** including the company that manages the IT system and some administrative, legal and accounting services, and the subsidiaries.

2) **Third parties** (companies, freelancers, etc.) operating within and outside the European Union and that process your Personal Data as part of:

- banking, financial and insurance services, payment systems, revenue offices and treasuries;
- assessment of financial risks with a view to preventing and controlling insolvency risk;
- credit collection and associated activities;
- providing and managing procedures and IT systems;
- security management and video surveillance services;
- real estate appraisal services;
- auditing and consultancy activities in general;
- managing communication with customers, as well as the storage of data and documents, whether in paper or electronic form;
- recording of service quality, market research, information and commercial promotion of its products and/or services.

3) **Authorities** (e.g. judicial, administrative etc.) and public information systems established at public administrations, such as, for example, the Central Credit Register at the Bank of Italy, the Central Means of Payment Antifraud Office (so-called UCAMP) and the Public system of administrative prevention of fraud in the area of consumer credit, with specific reference to identity theft (so-called SCIPAFI), the latter established at the Ministry of Economy and Finance, as well as the Tax Database "Anagrafe tributaria" - An archive of relationships with financial operators.

The companies of the Intesa Sanpaolo Group and the third parties your Personal Data may be communicated to, act as: 1) Data Controllers, i.e. subjects which determine the purposes and means of the Personal Data processing; 2) Data Processors, i.e. subjects which process the Personal Data on behalf of the Controller or 3) Joint Data Controllers, which determine, together with the Bank, the relevant purposes and means.

The updated list of the subjects identified as Data Controllers, Data Processors or Joint Data Controllers is available at all of Intesa Sanpaolo's branches.

#### **SECTION 5 - TRANSFER OF PERSONAL DATA TO A THIRD COUNTRY OR TO AN INTERNATIONAL ORGANISATION OUTSIDE THE EUROPEAN UNION.**

Your Personal Data is processed by the Bank inside the European Union and is not disseminated.

If necessary, for reasons of a technical or operational nature, the Bank reserves the right to transfer your Personal Data to countries outside the European Union or to international organisations for which there are "suitability" decisions of the European Commission, or based on the suitable guarantees provided by the country where the data must be transferred or based on specific exemptions required by the Regulation.

Furthermore, the Personal Data contained in the messages regarding financial transfers may be provided, for the exclusive purpose of preventing and fighting terrorism and its financing, to the public authorities of the United States of America.<sup>1</sup>

#### **SECTION 6 - PROCESSING METHOD AND PERSONAL DATA STORAGE PERIODS**

Your Personal Data will be processed using manual, electronic and telematic tools and in a way that ensures its security and confidentiality.

Your Personal Data is generally stored for a time period of 10 years starting from the termination of the contractual relationship you are part of. Likewise, the Personal Data may be processed for a longer time, in cases an act occurs that interrupts and/or suspends the provision that justifies the extension of the data storage.

#### **SECTION 7 - RIGHTS OF THE DATA SUBJECT**

In your capacity as Data Subject, you may exercise, at any time towards the Data Controller, the rights provided by the Regulation listed below, by sending a specific request in writing to the e-mail address [dpo@intesasanpaolo.com](mailto:dpo@intesasanpaolo.com) or to the certified e-mail address [privacy@pec.intesasanpaolo.com](mailto:privacy@pec.intesasanpaolo.com); via post to the address Intesa Sanpaolo S.p.A., Piazza San Carlo, 156 – 10121 Turin, Italy, or directly at any branch of the Bank.

With the same methods, you may revoke at any time the consent expressed with this Notice.

Any communications and actions undertaken by the Bank in connection with exercising the rights listed below, will be made free of charge. However, if your requests are demonstrably unfounded or excessive, in particular due to their repetitive character, the Bank may charge you a fee, taking into account the administrative costs incurred, or refuse to meet your requests.

##### **1. Right of access**

You can obtain confirmation from the Bank about whether your Personal Data is being processed or not and, in this case, obtain access to the Personal Data and the information envisaged under art. 15 of the Regulation, among which, by way of example: the purposes of the processing, the categories of Personal Data processed etc.

If the Personal Data is transferred to a third country or to an international organisation, you have the right to be informed of the existence of suitable guarantees relating to the transfer, as specified in Section 5.

If requested, the Bank can provide you with a copy of the Personal Data subject to processing. For any additional copies, the Bank may charge you a fee reasonably based on the administrative costs. If the request in question is submitted via electronic means, and unless otherwise specified, the information will be provided by the Bank in an electronic format of common usage.

##### **2. Right to rectification**

You may obtain rectification from the Bank of your Personal Data that is inexact as well as, taking into account the purpose of the processing, its integration, if the data is incomplete, by providing a supplementary declaration.

##### **3. Right to erasure**

You may request from the Data Controller the erasure of your Personal Data, if there is one of the reasons under art. 17 of the Regulation, including, by way of example, if the Personal Data is no longer necessary for the purposes for which it was collected or otherwise processed or if the consent on which the processing of your Personal Data is based was revoked by you or there is no other legal principle for the processing.

We hereby inform you that the Bank may not erase your Personal Data: if its processing is necessary, for example, to fulfil a legal obligation, for reasons of public interest, to verify, exercise or defend a right in court.

##### **4. Right to restriction of processing**

You may obtain the restriction of processing your Personal Data if one of the hypotheses under art. 18 of the Regulation applies, among which, for example:

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<sup>1</sup> In particular, the European Union and the United States of America entered into an Agreement (O.G. European Union L 195/5 of 27.7.2010) on transferring financial messaging data from the European Union to the United States, for the purpose of implementing the program to prevent and repress terrorism. According to the Agreement, in relation to some financial transactions (e.g. international bank transfers), except for those made in the single euro payments area (SEPA), the US Treasury Department may submit requests to acquire data directly to the provider of international financial messaging used by the bank (currently the company SWIFT). Strict guarantees are applied to this processing according to the mentioned Agreement, in relation to both the integrity and security of the data and its storage periods. In addition, the Agreement requires the right of access to be exercised by the Data Subject exclusively at the authority for data protection of his/her country: in Italy this is the Italian Data Protection Authority (website: [www.garanteprivacy.it](http://www.garanteprivacy.it)).

- objection to the accuracy of your Personal Data, for the period required for the Data Controller to conduct the necessary checks;
- objection to the processing, pending the appropriate checks to be conducted by the Data Controller regarding the reasons that legitimise the same processing.

#### **5. Right to data portability**

If the processing of your Personal Data is based on the consent or is necessary for the performance of a contract or pre-contractual measures and the processing is performed with automated means, you may:

- request to receive the Personal Data provided by you in a structured format, of common usage and legible by an automatic device (e.g.: a computer and/or tablet);
- send your Personal Data received to another Data Controller with no barrier by the Bank.

In addition, you may request that your Personal Data is sent by the Bank directly to another data controller specified by you. In this case, you shall provide us with all the exact details of the new data controller to whom you intend to transfer your Personal Data, providing us with suitable written authorisation.

#### **6. Right to object**

You may object to the processing of Personal Data at any time if the processing is performed for the execution of an activity of public interest or to achieve a legitimate interest of the Data Controller (including profiling).

Should you decide to exercise the right to object described here, the Bank will abstain from processing your personal data further, unless there are legitimate reasons to proceed with the processing (reasons prevailing over the interest, rights and freedoms of the data subject), or the processing is necessary to verify, exercise or defend a right in court.

#### **7. Automated decision process relating to natural persons, including profiling**

The Bank, in the presence of the creditworthiness requirements and to set amount thresholds, carries out automated decision-making processes, among others, to issue credit cards, for applications for personal loans and finalised loans, providing, in these cases, more details as part of specific information and acquiring, to this end, the explicit consent.

The Regulation grants the data subject the right not to be subject to a decision based only on the automated processing of your Personal Data, including profiling, which produces legal effects that concern you or significantly affect you, unless the above-mentioned decision:

- a) is necessary for the conclusion or performance of a contract between you and the Bank;
- b) is authorised by the Italian or European law;
- c) is based on your explicit consent.

In the cases under letters a) and c), the Bank will implement appropriate measures to protect your rights, your freedoms and your legitimate interest and you may exercise the right to obtain the human intervention by the Bank, to express your opinion or dispute the decision.

#### **8. Right to lodge a complaint with the Data Protection Authority**

Notwithstanding your right to appeal to any other administrative or jurisdictional court, should you deem that the processing of your Personal Data by the Data Controller takes place in breach of the Regulation and/or the applicable regulations, you may lodge a complaint with the competent Data Protection Authority.

### **SECTION 8 – PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA**

In relation to the processing of special categories of personal data (suitable to reveal racial and ethnic origin, political views, religious or philosophical beliefs or membership of trade unions, as well as processing genetic data, biometric data aiming to identify in a unique way a natural person, data relating to the health or sex life or the sexual orientation of a person) necessary to provide specific services and products, such as the stipulation of loans secured by insurance policies, the stipulation of insurance policies and the provision of welfare services, explicit consent is requested, notwithstanding the specific cases required by the Regulation which allow the processing of this Personal Data also in the absence of consent.

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#### **NOTICE TO LEGAL PERSONS, ENTITIES OR ASSOCIATIONS**

Intesa Sanpaolo S.p.A hereby informs you that the use of automated systems for calling or communicating a call without the intervention of an operator and electronic communications (e-mail, telefax, SMS, MMS or other) for carrying out promotional or market research activities is permitted only with the consent of the entities that are parties to an electronic communication services supply contract (“contracting parties”: this definition also includes legal persons, entities or associations).

The pursuit of such activities directed toward these parties requires a specific manifestation of consent.