



INFORMATION ON PERSONAL DATA PROCESSING CONCERNING VERSANT PLACEMENT TEST USERS

(pursuant to art.13 of EU Regulation No. 2016/679)

Premise

Pursuant to art. 13 of EU Regulation No. 2016/679 (GDPR) concerning the protection of individuals with regard to personal data processing, as well as the free circulation of such data, and which repeals Directive No. 95/46/EC, the University of Milan, as the Data Controller, hereby notifies the users registered for the English language Placement Test of how their data will be processed.

1. Data Controller and Data Protection Officer (DPO)

The Data Controller is Università degli Studi di Milano, in the person of the *pro tempore* Rector: 7, Festa del Perdono street, 20122 Milan, e-mail address: infoprivacy@unimi.it. Pursuant to art. 37 and following of EU Regulation No. 2016/679, the University has appointed lawyer Pierluigi Perri as the Data Protection Officer (DPO) at the *Cesare Beccaria* Department: 3, Festa del Perdono street, 20122 Milan, e-mail address: dpo@unimi.it.

2. Purpose and legal basis of processing

The personal data processed by the University of Milan are the following:

- a) Those data which are deemed as necessary to identify users when accessing services provided by platforms used to provide such services (i.e, personal details, contact details, identification document, user's device IP address); b) audio and video recording; c) native language and gender.

Such data are processed for the University's institutional purposes exclusively.

The legal basis of data processing consists in the implementation of a task of public interest to which the Data Controller is entitled pursuant to art.6, paragraph 1.e, of the GDPR.

The provision of data as per paragraph a) and b) is required in order to access the test; refusing to provide such data will prevent users from accessing the service requested.

The provision of data as per paragraph c) is not compulsory; users who refuse to provide such data will still be able to access the service requested.

3. Processing methods

Data collection takes place in compliance with the principles of relevance, completeness and non-excess in relation to the purposes for which they are processed.

The personal data provided are processed in compliance with the principles of lawfulness, fairness and transparency, under the provisions laid down in article 5 of the GDPR, also with the aid of IT and telematic tools designed to store and manage such data, and in any case in such a way as to guarantee their security and protect the utmost confidentiality of the interested party.

4. Categories of individuals to whom data may be communicated or who may become aware of them and potential data transfer abroad

User's personal data which have been collected during service implementation may be processed by the University employees responsible for the management of Placement tests, as authorised to process data, by further University facilities to carry out relevant activities if needed as well as by the licence provider, who has been expressly appointed as data processor under art.28 of the GDPR, and by sub-processors appointed by the processor themselves.

This is without prejudice to the disclosure of data, in accordance with the law in force, requested by Public Security Authorities, by Judicial Authorities or by other public entities for the purposes of defence, State security and investigation of crimes, as well as to their



communication to Judicial Authorities in compliance with legal obligations, when there is a hypothesis of crime.

Test written and oral answers entered by users, their gender and native language as well as the test identification number will be transferred in a Third country in a pseudonymised form.

5. Data retention

The personal data collected will be stored up to one year after test sitting for the purposes of test integrity.

6. Rights of the interested party

Pursuant to articles from 15 to 22 of the GDPR, and should there be a case for, the interested party may exercise the right to:

- ask the data controller to access the personal data which concern them, to amend or cancel these data, to limit their processing, as well as request data portability

by contacting the following: Data Protection Officer, 7, Festa del Perdono street, 20122 Milan - e-mail: dpo@pec.unimi.it.

7. Right to object

Pursuant to art.21, paragraph 1, of the GDPR, the interested party may object at any time and for reasons related to their particular situation to the processing of personal data which concern them as per art.6, paragraph 1.e, and that is when the legal basis of data processing consists in implementing a task of public interest, by contacting the following: Data Protection Officer, 7, Festa del Perdono street, 20122 Milan - e-mail: dpo@pec.unimi.it.

8. Right to lodge a complaint with a supervisory or judicial authority

Individuals who believe that the processing of the personal data which concern them infringes the present Regulation have the right to lodge a complaint to the relevant authority as provided for by art.77 of this Regulation or to appeal to the relevant judicial authorities under art.79 of this Regulation.

The Rector
Elio Franzini



UNIVERSITÀ DEGLI STUDI DI MILANO