



## INFORMATION NOTICE ON PERSONAL DATA PROCESSING FOR COURSES ADDRESSED TO THE GENERAL PUBLIC (pursuant to EU Regulations 2016/679)

### Foreword

Pursuant to art. 13 of the EU Regulation 2016/679 ("GDPR") on the protection of natural persons with regard to the processing of personal data, as well as on the free movement of such data and repealing Directive 95/46/EC, the University of Milan (hereinafter referred to as "the University"), in its capacity as Data Controller, informs individuals enrolled in courses open to the public about the use of their personal data.

### 1. 1. Data Controller and Data Protection Officer (DPO)

The Data Controller is the University of Milan, represented by the *pro tempore* Rector, with its registered office at Via Festa del Perdono n. 7, 20122 Milan, email: [supportodpo@unimi.it](mailto:supportodpo@unimi.it). Pursuant to articles 37 et seq. of the GDPR, the University has appointed the Data Protection Officer (DPO), identified as Prof. Avv. Pierluigi Perri, c/o "Cesare Beccaria" Department, Via Festa del Perdono n. 7, 20122 Milan, email: [dpo@unimi.it](mailto:dpo@unimi.it).

### 2. Processed personal data, data subjects, purpose, and legal basis of processing

The personal data of concerned individuals (citizens, University students, and students from other Italian or foreign universities) subject to processing are as follows:

- identification details: name, surname, date and place of birth, residence and/or domicile, tax code, identity document;
- contact details: email address and phone number;
- bank details;
- academic data: CV, initial language proficiency level, final course assessment;
- multimedia data: image and voice;
- health-related data: food intolerances or allergies, specific dietary needs (only for courses held at the University branch in Gargnano - BS).

The collected personal data will be processed for the following purposes:

- a) to manage the enrolment of data subjects in the courses, as well as the execution and organization of the courses;
  - b) to provide accommodation and meals for course participants at the University branch in Gargnano - BS;
  - c) to carry out all the activities required by law;
  - d) to publish photos and videos taken during the courses on the University's official communication channels (website and social media)
- to promote the learning activities and services carried out by the University.

The processing for the purpose referred to in letter a) is based on the performance of a task carried out in the public interest, with which the Controller is entrusted (art. 6 par.1(e) of the GDPR).

For the purpose referred to in letter c), instead, the legal basis which makes the processing lawful is compliance with a legal obligation (art. 6 par. 1(c) of the GDPR).

The purposes referred to in letters b) and d), on the other hand, are lawful solely on the basis of the explicit and separate consent of the data subject (art. 6 par. 1(a) of the GDPR), and the provision of the related personal data is entirely free and optional.

### 3. Processing methods

The collection of data is carried out with respect to the principles of relevance, completeness and data minimization in relation to the purposes for which they are processed.

The provided personal data are processed in accordance with the principles of lawfulness, fairness and transparency as set out in art. 5 of the GDPR, also with the aid of IT and telematic tools designed to store and manage the data, and, in any case, in a manner that ensures their security and protects the maximum confidentiality of the data subject.



#### 4. Categories of individuals authorized to process the data and to whom the data may be disclosed

The personal data will be processed by employees of the University of Milan, as individuals authorized to process the data.

Moreover, the data may be disclosed to:

- a) the University of origin of the enrolled students from other Italian or foreign universities;
- b) to external parties performing activities related to the processing on behalf of the University, appropriately appointed as Data processors pursuant to art. 28 of the GDPR;
- c) public or private bodies authorized by law or regulation to process the data for their own purposes.

The communication of data requested, in any case, in accordance with the law by Public Security Authorities, Judicial Authorities, or other public bodies for the purposes of defence, state security, and criminal investigation is exempted.

Apart from the aforementioned cases, personal data shall not be disclosed or communicated.

Lastly, personal data will not be transferred to third Countries or international organizations.

#### 5. Retention period

The retention period for personal data is unlimited, except for individuals who are not admitted to the courses and for health-related data. In the latter cases, the retention period is 10 years.

#### 6. Rights of the data subject

The data subject may exercise, pursuant to art. 15 to 22 of the GDPR, the right to request the Data Controller access to personal data concerning them, rectification or erasure of the same, restriction of processing, by contacting the following: Data Controller, Prof. Avv. Pierluigi Perri, c/o "Cesare Beccaria" Department, Via Festa del Perdono n.7, 20122 Milan - e-mail: [dpo@unimi.it](mailto:dpo@unimi.it).

#### 7. Right to object

Pursuant to art. 21 par. 1 of the GDPR, the data subject may object at any moment, for reasons related to their specific situation, to the processing of their personal data carried out under art. 6, par 1.e), i.e. when the processing is based on the performance of a task carried out in the public interest, by contacting the following: Data Controller, Prof. Avv. Pierluigi Perri, c/o "Cesare Beccaria" Department, Via Festa del Perdono n.7, 20122 Milan - e-mail: [dpo@unimi.it](mailto:dpo@unimi.it).

#### 8. Right to lodge a complaint with a Supervisory Authority or before a Judicial Authority

Data subjects who believe that the processing of their personal data is in breach of the GDPR have the right to lodge a complaint with the Supervisory Authority, as provided for by art. 77 of the GDPR, or to seek judicial remedy pursuant to art. 79 of the GDPR.

#### 9. Changes to this Privacy Notice

The data controller may make changes and/or additions to this privacy notice.

The most recent version is always available at the following link

<https://www.unimi.it/en/university/legislation/privacy>.