



Information on the processing of personal data belonging to data subjects taking admission tests, undergraduate and post-graduate students enrolled in all the degree programmes, single courses, vocational master programmes, post-graduate programmes, lifelong learning programmes, doctoral programmes, State Certification Exams and students participating in international mobility programmes
(pursuant to the Regulation EU 679/2016)

Introduction

Pursuant to article 13 and 14 of the EU Regulation 2016/679 ("GDPR") on the protection of individuals with regard to the processing of their personal data, and the free movement of such data which repeals Directive 95/46/EC, The University of Milan informs all data subjects taking admission tests for degree programmes, undergraduate and post-graduate students enrolled in all the degree programmes, single courses, vocational master programmes, post-graduate programmes, lifelong learning programmes, doctoral programmes, State Certification Exams and incoming and outgoing students participating in international mobility programmes, on the processing of their personal data.

The above is without prejudice to compliance by The University of Milan with legislation in force governing transparency and the mandatory publication of data and documents.

1. Data Controller and Data Protection Officer

The Data Controller is The University of Milan, and specifically the pro tempore legal representative, Via Festa del Perdono no. 7, 20122 Milan, e-mail: supportodpo@unimi.it.

Pursuant to articles 37 et seq of the GDPR, the University has appointed Pierluigi Perri, c/o Department "Cesare Beccaria", Via Festa del Perdono no. 7, 20122 Milan, PEC/e-mail: dpo@unimi.it, as the Data Protection Officer.

2. Type of personal data processed, purpose and legal basis of processing

In all cases, the personal data being processed is:

- a) personal and contact data (name, surname, date and place of birth, tax code number, residence, legal domicile, citizenship, e-mail, PEC certified email, telephone number), complete identity document, passport-sized photo, visas/resident permits.

With regard to specific situations or in order to meet requests made by students, the following personal data may be subject to processing:

- b) career data both current and previous (secondary schools or any academic career), qualifications
- c) bank data, income and wealth data concerning the person and his or her household
- d) special categories of personal data such as ethnicity, refugee status, data relating to health.
- e) data relating to criminal convictions or offences and associated security measures.



The purposes of personal data processing are:

- ☐ the use of IT services and e-mail
- ☐ enrolment on degree programme admission tests and tests to assess educational background
- ☐ enrolment on degree programmes or on State Certification Exams
- ☐ the use of benefits and incentives including those relating to education right programmes
- ☐ payment of university fees
- ☐ the provision of in-person and e-learning educational activities and exams, booking of services related to educational and study activities
- ☐ the participation in traineeships and internships, including orientation internships and placements, the use of counselling services and other services designed to facilitate university studies for students with disabilities or specific learning disabilities (SLD)
- ☐ tutoring services, assistance and social inclusion
- ☐ management of the educational track
- ☐ communication of incentives and promotions
- ☐ the use of canteen services and student accommodation
- ☐ participation in international mobility programmes
- ☐ students' careers and gained skills
- ☐ election of student representatives to University governance and in national and regional bodies
- ☐ performance of activities related to roles held in University governance bodies
- ☐ verification of information declared in self-certifications
- ☐ the use of university library services
- ☐ access to laboratories and other protected facilities
- ☐ statistical surveys and assessment of teaching activities
- ☐ communications, institutional information and community development
- ☐ disputes, complaints and disciplinary proceedings
- ☐ any other processing of personal data required by law
- ☐ improvement to the quality of services and available teaching activities through the use of questionnaires to be filled in by students, some of which are compulsory.

Personal data are processed solely within the scope of the University's institutional purposes and in order to perform specific services requested by users.

The legal basis for processing is article 6 paragraph 1 subparagraph c) of the GDPR, namely fulfilment of a legal obligation to which the Data Controller is subject, in order to verify information declared in self-certifications and for purposes relating to any disputes, article 6 paragraph 1 subparagraph e) of the GDPR and article 2-ter of Legislative Decree 196/03, related to the performance of a public interest duty or a duty connected with the exercise of public powers exercised by the Data Controller or a general administrative act, for all other purposes.

The provision of personal data is a mandatory requirement, failing which it will not be possible to engage with the University or to use of the requested services and benefits.

3. Source of personal data

In cases where personal data are not acquired from the data subject, the Data Controller provides this information within a reasonable period of time after obtaining the personal data or, if the personal data are



to be used for communication with the data subject, at the latest at the time of the first communication to that data subject, or lastly if a disclosure to another recipient is envisaged, at the latest when the personal data are first disclosed.

4. Means of data processing

The acquisition of data takes place in accordance with principles of adequacy, relevance and limitation to what is necessary in relation to the purposes for which they are processed. Personal data are processed in accordance with principles of lawfulness, fairness, and transparency, as required by law, including through the use of digital instruments designed to store and manage such data, and however in such a manner as to ensure the security of personal data and safeguard the data subject's confidentiality.

5. Categories of recipients of the personal data

Personal data shall be processed in accordance with applicable legislation in force, by the University's employees (persons authorised to process personal data) in accordance with their functions as per the University organisational chart. Personal data may also be forwarded:

- a) to all facilities pertaining to the University of Milan, including functional and service centres, to the UNIMI Foundation, to other Universities, including foreign universities, to non-commercial public entities or private consortium members or partner organisations when it is necessary to forward such data in order for the University or the applicant organisation to perform its institutional functions or in order to meet specific requests made by the data subject or, in all cases, for institutional activities performed by the University in its own interest;
- b) to external entities identified as Data Processors (for example, public and private entities managing university residences and/or other services relating to Education Right Programmes, third parties processing data to manage the University's IT systems and services, third parties managing funds and collaborating to organise post-degree training activities, third parties engaged to print degree certificates, entities performing security and safety services at the University's facilities, external parties providing tutoring, assistance and social inclusion services);
- c) to public and private entities in order to facilitate job orientation, training and employment of the University's students and graduates;
- d) to financial entities managing the bank services associated with the bank card/badge issued during enrolment (in the event of students enrolled on courses granting entitlement to university badges), which process the data in their capacity as independent data controllers and provide data subjects with their specific data protection policies;
- e) to members of the Examination Board;
- f) to MUR [Ministry of Universities and Research], CUN [Italian National University Council], Department of Public Functions, the Foreign Ministry, Police, Embassies and foreign public authorities (even outside EU), Italian Representatives abroad, Attorney General's Office, hospitals, judicial authorities, Tax Authority, Italy's Regions, Municipalities, Ministry of Employment, European Commission, INDIRE National Erasmus+ Agency; public and private entities where traineeships are held and to organisations which verify information declared in self-certifications;



g) in case of specializing doctors, to Hospitals and to other public and private entities and/or other universities (to the extent that they process personal data within the framework of duties and functions performed on behalf of the University);

h) to the occupational physician.

Within the framework of the activities listed in point 2, special categories of personal data and data relating to criminal conviction and offences may only be forwarded where allowed by legal provisions or regulations or general administrative acts pursuant to article 2-sexies, paragraph 1 of Legislative Decree 196/2003 and subsequent amendments.

In all cases, this is without prejudice to the communication of data requested, in accordance with law, by public security authorities, law courts or other public entities for the purposes of defence, state security and investigating criminal offences, in addition to forwarding of such data to the law courts in compliance with legal obligations, where it is suspected that criminal offences have been committed.

Aside from the aforementioned cases, under no circumstances and for no reason whatsoever personal data will be forwarded or disseminated.

6. Transfer of data to third countries or to international organisations

Personal data may be transferred, where necessary in order to fulfil the purposes indicated above, to third countries which are not members of the European Economic Area or to international organisations in accordance with the provisions of Chapter V of the GDPR (for instance: adequacy decision, standard contractual clauses, performance of a contract, consent by the data subject, important reasons of public interest).

Personal data transfer may happen in cases where:

- a) a specific request is made by the student;
- b) incoming and outgoing students participate in International Mobility programmes including within the framework of programmes provided in partnership between several universities/organisations, or students access programmes provided by The University of Milan with study qualifications obtained abroad.

Personal data pertaining to the students may be transferred to:

- a) non-European Union universities or relevant organisations (in cases where it is necessary to check qualifications for professional reasons or to continue studies);
- b) foreign embassies or embassies abroad (including for exemption from military service);
- c) non-European Union organisations/universities which students participating in International Mobility programmes come from and/or which they must attend for all activities relating to the fulfilment and management of students exchange programmes, including within the framework of programmes provided in partnerships between several universities/organisations;
- d) foreign authorities for other purposes such as the granting of benefits or for professional practice;
- e) international organisations for implementing internships etc.



7. Data Retention Period

Personal data contained in the student's file is kept indefinitely, whereas personal data contained in other documents shall be kept for the period of time indicated, for each type of document, in the "Guidelines on retention timeframes and the manner in which administrative documents are disposed of" as published on the University's website.

8. Data Subject's Rights

Pursuant to articles 15 to 22 of the GDPR, should all conditions be met, the Data Subject may exercise his or her right to ask the Data Controller for access to personal data relating to him or her, rectification and erasure of his or her personal data, restrictions on processing, by contacting the Data Protection Officer, Pierluigi Perri, c/o Dipartimento "Cesare Beccaria", Via Festa del Perdono no. 7, 20122 Milano, PEC/e-mail: dpo@unimi.it.

9. Right to raise objection

Pursuant to article 21 paragraph 1 of the GDPR, the data subject may, at any time, object, for reasons relating to his or her specific situation, to the processing of personal data concerning him or her undertaken pursuant to article 6, paragraph 1 subparagraph e) and specifically when the legal basis of data processing is performing a public interest duty, applying to the following contact address: Data Protection Officer, Pierluigi Perri, c/o Dipartimento "Cesare Beccaria", Via Festa del Perdono no. 7, 20122 Milano, PEC/e-mail: dpo@unimi.it.

10. Right to file a complaint with an oversight authority or a law court

Data subjects who believe that personal data relating to them has been processed in breach of the provisions of the GDPR are entitled to file a complaint with the Data Protection Authority as contemplated by article 77 of the GDPR or to take the case before appropriate courts pursuant to article 79 of the GDPR.

11. Amendments to information

This information may later be amended. You are therefore advised to check on the website <https://www.unimi.it/en/university/legislation/privacy> that the version referred to is the most updated one.