

Annex to the Rectoral Decree no. 90, November 16 2021

**UNIVERSITA' COMMERCIALE "LUIGI BOCCONI" REGULATIONS FOR THE
ACTIVATION AND MANAGEMENT OF ALIAS IDENTITIES FOR TRANSGENDER
OR GENDER NON-CONFORMING PERSONS**

Art. 1- Purpose and Object

- 1.1 In pursuit of its institutional educational, research and dissemination of knowledge and expertise purposes, Università Commerciale “Luigi Bocconi” (hereinafter the "University") is committed in fostering and nourishing the value of diversity and to oppose any form of discrimination carried out against individuals, recognizing the essence of the values on which the Bocconi community was founded while respecting the freedoms of individuals. To this end, the University attributes essential importance to the adoption of any means so to ensure the harmonious coexistence of all members of its community.
- 1.2 In compliance with the principles indicated above and in full accordance with the University Statute, as well as the Honor Code, these Regulations are issued for the activation and management of Alias identities, with the aim of protecting anyone who, for the reasons indicated below and on the basis of the principle of gender self-determination, wishes to use a name other than their legal name when carrying out study or work activities within the University.
- 1.3 The recognition of Alias identities is made possible through an administrative procedure that provides for the temporary replacement of the name included in the University's registry with a different name (an Alias) on University platforms and on any other tool or infrastructure at the University itself that require a name be used for which a replacement with the Alias name has been requested. The Alias identity will have no legal value and will be used temporarily only within the University, pending the legal rectification of the gender registry, pursuant to Italian Law 164/1982 and subsequent additions and amendments, or an equivalent provision issued by competent Authorities.
- 1.4 The Alias identity will be inextricably associated with the current identity referring to the applicant and will remain active as long as the applicant's relationship with the University is in force, without prejudice to requests for interruptions made by the applicant, or reasons for interruption referred to in art. 6 below.

Art. 2 – Alias Identity: recipients

- 2.1 With these Regulations, the University governs the procedures aimed at activating an Alias identity for all members of the University who intend to change their name and/or gender in the expression of their freedom of self-determination.
- 2.2 The request to start the Alias procedure can therefore be submitted by:
 - a) students enrolled in any way at the University, for example, enrolled in Bachelor of Science programs, Master of Science programs, Master of Arts programs, postgraduate courses, Specialized Master programs, including MBAs and EMBA, PhD candidates, etc. (hereinafter, collectively referred to as "Students");
 - b) teaching staff: i.e. assistant, associate and full professors, lecturers, researchers, and other teaching staff (hereinafter, collectively referred to as "Faculty");
 - c) technical and administrative staff employed in any way at the University (hereinafter, "Staff").
- 2.3 Persons who intend to make use of an Alias identity are identified below with the term "Applicant".

Art. 3 - Alias Committee

3.1 The University identifies the "Alias Committee" as the competent body for receiving and evaluating requests for activating Alias identities as per the procedure referred to in art. 4 below. The Alias Committee is composed of at least 4 members including the Dean for Diversity and Inclusion who chairs it and at least three of the following subjects from time to time identified by the above Dean depending on the category to which the Applicant belongs (see above article 2.2) in order to ensure better effectiveness of the Alias procedure:

- Dean of Graduate School
- Director of Institutional Affairs and Compliance Governance
- Director of Students
- Head of HR Faculty and Staff
- Head of Academic Affairs
- SDA Bocconi Managing Director

The Alias Committee's composition as above outlined may be changed at any time, upon proposal from the Dean who chairs it approved by the Rector and the Managing Director.

3.2 The Alias Committee appoints the reference persons who will act as Tutors to Applicant, assisting them in the various phases of the Alias procedure, as better indicated in art. 5 below.

3.3 If the Applicant's request is accepted, the Alias Committee starts the procedure by involving the relevant Organizational Units at the University, who will coordinate with each other and with the Alias Committee to render the Alias identity effective.

Art. 4 - Activation of the Alias Identity - Procedure

4.1 In order to activate an Alias identity, Applicants must:

- a) submit a specific request to the email address alias@unibocconi.it, by completing and signing the form that can be downloaded from the link on the University website; by signing the application, Applicants declare, under their own responsibility, that they are in one of the situations envisaged for the recognition of an Alias identity, indicating the chosen Alias name;
- b) submit with the application the confidentiality agreement (hereinafter "Confidentiality Agreement") signed by the Applicant and downloadable at the link on the University website.

4.2 After positively assessing the request, the Alias Committee will notify the Applicant by email to the address indicated in the Alias identity application, that such request has been accepted. The communication will be sent also to the Rector/Managing Director, and to the Directors of the Organizational Units involved.

4.3 In the event that the request is not accepted, the Alias Committee will notify the Applicant by email, with a reasoned opinion.

4.4 At the same time as the notification of acceptance of the application referred to in point 4.2 above, the procedure for activating an Alias identity will be started, involving all the concerned Organizational Units of the University, which will entail:

- issuing a temporary student ID, provided with the Applicant's photo, indicating the Alias name and student ID number to replace the previous student ID, where such previous ID exists;
 - assigning the Applicant with a provisional University email address to replace the previous email address;
 - providing temporary credentials to access the University systems/platforms involved based on the Applicant's role and activities at the University;
 - where applicable, a nameplate on the door of the office where the Applicant works, indicating the chosen name;
 - releasing and/or attributing any further credentials and/or tools, accessories, and any further fulfillments that may be necessary in relation to the role held and the activities carried out at the University by the Applicant.
- 4.5 In the University's IT systems, the Alias identity will be associated with the Applicant's personal data and will remain active as long as the relationship with the University is in force, without prejudice to requests for interruptions filed by the Applicant and/or reasons of interruption referred to in art. 8 below.
- 4.6. These Regulations, the information relating to how to activate an Alias identity and the related forms are published on the University website, along with contact information for reference persons.

Art. 5 - Tutors

- 5.1 The Alias Committee appoints Tutors who have been adequately trained and who have the task of assisting Applicants in the procedure, from the moment in which they submit a request pursuant to art. 4.1 a) above, and, in any case, up to the termination for any reason of the relationship between the University and the Applicant.
- 5.2 Tutors are identified among subjects belonging to the Staff or Faculty, according to the following criterion which may be waived due to specific organizational needs of the University or due to needs related to the specific case
- Students: Tutor belonging to the Faculty or Staff
 - Faculty: Tutor belonging to the Faculty
 - Staff: Tutor belonging to the Staff

Art. 6 - Effects vis-a-vis Third Parties - Interruptions and Suspensions

- 6.1 Certifications referring to the Applicant issued by the University for external use shall refer exclusively to the legally registered identity of the same. An Alias identity has in fact no effect vis-a-vis third parties and the University therefore shall not issue any official declarations or certifications relating to an Alias identity.
- 6.2 Until the rectification judgment referred to in art. 7.2 below, or any other equivalent provision issued by the competent Authorities, the Applicant, pursuant to Presidential Decree 445/2000, may issue self-declarations of certification or affidavit related to the Applicant career at the University to be used outside the University itself, providing that above declarations/affidavit but shall be referred exclusively to the Applicant's actual legally registered identity.

- 6.3 After the rectification judgment or other equivalent provision issued by the competent Authorities has been issued as indicated in article 7.2 below, Applicants will have the right to issue a rectified certification corresponding to the new legal identity.
- 6.4 In the case of Students, in the event that Applicants complete the final qualification of their program of study but the rectification judgment as per the Italian Law no. 164 of 14 April 1982 or an equivalent provision is still not made definitive, all the documents of the Alias academic career will be understood as referring to the Applicant's legally registered identity and, as a result, any related certifications/declarations and the diploma will be issued accordingly.
- 6.5 Any pre-existing ID cards and/or badges/nameplates will be collected and kept by the administration until the rectification judgment or an equivalent provision referred to in art. 7.2 below, without prejudice to requests for interruptions filed by the Applicant or reasons of interruption referred to in art. 8 below.
- 6.6 In the event of interruption or suspension of the Alias identity for any reason, Applicants must cease using their ID card and any other temporarily issued tools/accessories, including email addresses and all temporary access credentials issued. In such cases, until the cause of interruption/suspension has ceased, Applicants must use the previous ID card/badges and nameplates and any other accessories, including previous email addresses and previous access credentials to platforms.

Art. 7 - Obligations of the Applicant

- 7.1 If Applicants intend to carry out activities within the University that have external relevance (by way of example but not limited to, participation in internships, participation in international mobility projects, requests for scholarships funded by third parties), they must inform their Tutor in advance, in order to verify if and in what ways such activities can be carried out using the assigned Alias identity.
- 7.2 Applicants undertake to promptly notify the University, in the person of the Tutor, that a rectification judgment for the attribution of gender and name has been issued by the competent Court/Authority, or a judgment/provision of refusal has been issued, or any other equivalent provision issued by the competent Authorities, or the Applicants' decision to turn back to the use of their legal name and any circumstances concerning the legal procedure for gender change or any other reconsiderations.
- 7.3 Applicants also undertake to provide the University with truthful and reliable information, aware that any false or misleading statements may give rise to possible sanctions by the University as per article 8 below.

Art. 8 - Violations

- 8.1 If there are well-founded reasons to believe that the Applicant has violated the provisions of these Regulations, the Alias identity will be immediately suspended as a precautionary measure by the Rector or the Managing Director. Occurring such event, provisions of art. 6.6 above shall apply.
- 8.2 If the breach of the Regulations is ascertained, the Applicant will be referred and reported to the University competent disciplinary body, the Alias identity will be deactivated, as will the email address and any credentials issued in the meantime, and the Applicant will have to return the ID card and any other temporarily issued tools/accessories, without prejudice to

any further sanctions that the disciplinary body may apply referred to the Applicants' career at the University.

Article 9 - Processing of Personal Data

- 9.1 The University shall process the Applicant's data according to the methods indicated in the Confidentiality Agreement and exclusively for the purposes set out therein and connected to the procedures specified therein. It shall be processed in compliance with the General Data Protection Regulation (EU Regulation 2016/679), and in compliance with national legislation, pursuant to Legislative Decree no. 196, 30 June 2003, Italian Personal Data Protection Code, integrated with the changes introduced by Italian Legislative Decree no. 101/2018, as well as University regulations.

Art. 10 - Implementation and Release

- 10.1 These Regulations have been approved by the Executive Committee of the Board of Directors held in July, 19 2021, having acquired the opinion of the Academic Council of July 13, 2021, have been issued with Rectoral Decree no. 90 of November 16, 2021 and enter into force on ^t January 1st 2022.
- 10.2 The University is committed to the maximum dissemination of the adopted Regulations and any subsequent amendments and additions in the forms of communication deemed most suitable and effective.