Bocconi

PRIVACY POLICY

STUDENTS AND ALUMNI

We would like to inform you that your personal data will be processed in compliance with the legislation on the protection of personal data (EU Regulation 2016/679, "GDPR"), and D. Legislative Decree 196/2003 and ss.mm.ii. ("Privacy Code").

1. Data controller

The Data Controller is the Università Commerciale "Luigi Bocconi", with registered office in Via Sarfatti 25, 20100 Milano (MI).

2. Data Protection Officer

Bocconi has appointed a *Data Protection Officer* (hereinafter DPO) who can be reached at the following mailbox: dpo@unibocconi.it

3. Processing of personal data

Purpose of processing	**Legal basis**	**Personal data processed**	**Retention period**
A) The provision of education and the management of students' careers	Performance of a task carried out in the public interest (Art. 6(1)(e) GDPR)	• name • surname • email address • tax code • home address • nationality • registration number • attendance register	• personal data stored in ESSE3 are retained indefinitely • personal data relating to class attendance will be anonymised once the qualification is obtained
B) The management of examinations	Performance of a task carried out in the public interest (Art. 6(1)(e) GDPR)	• name • surname • email address • tax code • home address • nationality • registration number	• written exam tests (both digital and hard copy) will be kept for a period of five years (+1 year at end of the academic year) • dissertations are retained indefinitely for archival purposes and, subject to the student's consent, may be published
C) The provision of services for vulnerable and/or disabled peolple includes mentoring, assistance, social	Performance of a task carried out in the public interest (Art. 9(1)(g) GDPR)	• health data	• data on permanent disabilities are deleted at the end of the university

Purpose of processing	Legal basis	Personal data processed	Retention period
inclusion and labour inclusion			career • data on temporary disabilities are deleted at the end of the academic year
D) The management of disciplinary proceedings against students	Performance of a task carried out in the public interest (Art. 6(1)(e) GDPR)	• name • surname • email address • registration number • academic and career information	• any disciplinary measure taken by the University, being part of the student's career, is retained indefinitely by the University • revoked or annulled measures will be retained for 5 years
E) Allocation of benefits and related definition of fees and contributions, allocation of scholarships, refunds and accommodation places	Performance of a task carried out in the public interest (Art. 6(1)(e) GDPR)	• name • surname • email address • tax code • home address • nationality • freshman • economic and financial data • medical certificates	• 10 years
F) Management of curricular and extra-curricular traineeship, orientation and job placement activities	Performance of a task carried out in the public interest (Art. 6(1)(e) GDPR)	• name • surname • email address • tax code • home address • nationality • registration number • certificate certifying completion of the traineeship	• personal data stored in ESSE3 are retained indefinitely • personal data processed for orientation and job placement purposes are stored on Symplicity and retained for as long as necessary to finalise the activities
G) Management of study	Performance of a	• name	• personal data

Purpose of processing	Legal basis	Personal data processed	Retention period
abroad programmes (e.g. Exchange, Double Degree, CEMS, Themis)	task carried out in the public interest (Art. 6(1)(e) GDPR)	• surname • email address • tax code • home address • nationality • registration number • official transcript	stored in ESSE3 are retained indefinitely
H) Statistical elaborations on students, graduates and diploma holders	Performance of a task in the public interest (Art. 6(1)(e) GDPR)	• name • surname • email address • freshman • academic and career information	• personal data stored on ESSE3 and CRM are retained indefinitely
I) Ranking Purposes	Consent of the data subject (Art. 6(1)(a) GDPR)	• name • surname • email address	• Until revocation of any consent given
L) Sending communications from the University to students, including those relating to events and activities organised by the University, including initiatives in support of the University.	Performance of a task carried out in the public interest (Art. 6(1)(e) GDPR)	• name • surname • e-mail address	• data will be processed throughout the student's university career.
M) sending of communications to UB Alumni and SDA by the University, including those relating to events and activities organised by the University -in Italy and worldwide (Chapter), including initiatives in support of the University.	Performance of a task carried out in the public interest (Art. 6(1)(e) GDPR)	• name • surname • e-mail address • tax code • residence/ domicile/ work address • nationality • registration number • grade and date • company where he/she works and job title	• The data will be processed after graduation. The data will be processed until the data subjects opt-out to receiving communications from the University
N) Management of specific requests made by Students/Alumni, including through the request form and virtual	Performance of a task carried in the public interest (Art. 6(1)(e) GDPR)	• name • surname • e-mail address • registration	• for the time needed to process the request • 3 years for

Purpose of processing	Legal basis	Personal data processed	Retention period
assistant available in the B in Touch help center		number • academic and career information (degree programme and academic regulations) • conversation with the virtual assistant	requests and conversations with the virtual assistant
O) Communication of data to third parties for networking purposes	Consent given by the data subject (Art. 6(1)(a) GDPR)	• name • surname • e-mail address	• Until revocation of consent
P) Publication of participants in events organised by the University	Consent of the data subject (Art. 6(1)(a) GDPR)	• name • surname • e-mail address • photography	• Until revocation of consent
Q) Management of activities and services reserved for Alumni (by way of example only: reservation of Clubhouse spaces, access to the Library, use of post-graduate career services)	Performance of a task carried in the public interest (Art. 6(1)(e) GDPR)	• name • surname • email address • tax code • residence/ domicile/ work address • nationality • registration number • grade, date • company where he/she works and job title	• The data will be processed until the data subject objects to receiving communications from the University
R) Disclosure of student beneficiary's data to the supporting Donor	Consent of the data subject (Art. 6(1)(a)) GDPR	• name • surname • date and place of birth • photography	• Until revocation of consent given

4. Modalities of data processing

In relation to the aforementioned purposes, personal data are processed by means of manual, computerised and telematic tools in a manner strictly related to those purposes and, in any case, in such a way as to guarantee the security and confidentiality of the data, in addition to compliance with the specific obligations laid down by law.

No automated decision-making processes will be used during the processing operations.

5. Disclosure of personal data

For the pursuit of the above-mentioned purposes, the personal data collected may be communicated to

a) Internal units within the University. Personal data will be processed by authorised personnel, pursuant to Article 29 of the GDPR and Article *2-quaterdecies* of the Privacy Code.

   In detail, the directorates involved are:

   1. Academic Services
   2. Students Outreach & Support
   3. Academic Affairs& Partners
   4. International Relations
   5. Employer Relations & Career Services
   6. Planning, Control & Valuation
   7. Administration & Treasury
   8. Library & Archives
   9. Alumni & Fundraising

b) third companies appointed as Data Processors, pursuant to Article 28 of the GDPR.

c) The data may also be communicated to

   - competent ministries and public authorities, according to the law
   - Universities or other bodies responsible for the right to study in the event of continuing one's career at a university other than that of first enrolment
   - Foreign universities, engaged in educational pathways (including with the award of joint degrees) or with which Bocconi has partnerships or other collaboration (e.g. network)
   - External Community Management and/or Fundraising Services

In any event, the data subject may request further information by writing to the DPO at the addresses indicated in section 2.

6. Transfer of data outside the EU

Some processing operations carried out by the University, for the purposes listed above, involve the transfer of personal data outside the European Union. The transfer of personal data to third parties resident or located in countries that do not belong to the European Union and that do not ensure adequate levels of protection will only be carried out after specific agreements have been concluded between the University and said parties, containing safeguard clauses and appropriate guarantees for the protection of personal data - Standard Contractual Clauses - approved by the European Commission, as provided for in Chapter V, articles 44 et seq. of the

GDPR, as well as in compliance with the provisions adopted by the European Court of Justice and by national and foreign Authorities on the protection of personal data.

In any event, the data subject may request further information by writing to the DPO, at the addresses listed under point 2.

7. The rights of the data subject

You have the right to exercise the rights recognised by the legislation at any time, pursuant to Articles 15-22 of the GDPR. In particular, as a data subject, you have the right to obtain:

a. confirmation as to whether or not personal data are being processed and access to the data and the following information: purpose of processing, categories of personal data, recipients and/or categories of recipients, storage period;

b. rectification of inaccurate personal data and/or supplementation of incomplete data, including by providing a supplementary declaration;

c. erasure, in the cases provided for by the GDPR;

d. the restriction of processing in the cases provided for by the privacy legislation in force;

e. data portability and, in particular, the possibility of requesting the direct transmission of processed personal data to another data controller;

f. revocation of any consent given, without prejudice to the lawfulness of the processing based on the consent before revocation;

g. opposition, at any time, to the processing, pursuant to Article 21 of the GDPR.

Without prejudice to any other administrative or jurisdictional recourse, you also have the right to lodge a complaint (Art. 77 GDPR) with the Privacy Guarantor (www.garanteprivacy.it), if you consider that the processing concerning you violates the regulations in force on the protection of personal data.

In order to exercise all the above-mentioned rights, the data subject may use the dedicated Privacy Web Form available here (or by scanning the QR code below), or contact the Data Controller or the DPO in writing at the contact details indicated above.

Privacy Web Form



□ I declare that I have read and understood the information on the processing of my personal data

□ I consent to the processing of my personal data for *ranking* purposes

□ I give my consent for my personal data to be communicated to third parties for networking purposes

□ I consent to the publication of my personal data as a participant in events organised by the University

□ I give my consent for my personal data to be disclosed to the Donor who supported me (this consent is given by those who were recipients of a donation)