

## PRIVACY POLICY

BOCCONI SPORT



With the following privacy policy statement, Università Commerciale Luigi Bocconi (hereinafter "University") and Bocconi Sport Team (hereinafter "BST") inform you that - pursuant to and in accordance with the provisions of Article 13 of the European Regulation 2016/679 on the protection of personal data ("GDPR") - your personal data will be processed through electronic and manual means, in Italy and abroad.

This notice is drafted on the basis of the principle of transparency and all the elements required by the GDPR and is divided into individual sections in order to make reading quicker, easier and easier to understand (hereinafter referred to as "Notice").

### **1. JOINT DATA CONTROLLERS**

The Joint Data Controllers, pursuant to and for the purposes of Art. 26 of the GDPR, are the Università Commerciale Luigi Bocconi, with registered office in Milan, via Roberto Sarfatti, 25, 20100 Milano and Bocconi Sport Team with registered office in Milan, via Sarfatti 25, registered with the Companies' Register of Milan, Tax Code and VAT No. 04077170969 (hereinafter jointly referred to as "Data Controllers").

The Joint Controllers entered into a Joint Controllership agreement by which they undertook to:

- a. jointly determine how your personal data will be processed for the purposes set out below,
- b. jointly determine, in a clear and transparent manner, the procedures for providing you with timely feedback should you wish to exercise your rights, as set out in the articles of the GDPR,
- c. jointly define the information to be provided in the parts of common interest indicating all the information required by the Regulation.

### **2. PURPOSE OF PROCESSING**

Your personal data will be processed for the following purposes:

- a. access the Sportricket portal (hereinafter also the "Portal"),
- b. book the activities of your interest directly on the Portal,
- c. allow you to carry out the sports activities of your interest at the multi-purpose sports centre located in Milan, Viale Toscana 30, called "Bocconi Sport Center" (hereinafter referred to as "BSC"),
- d. Access to the BSC pools also through the use of the University badge or, if you are an Alumnus, through the presentation of an identity document for the creation of a generic user account for access,
- e. send you communications on the sports activities offered in the BSC
- f. book the agreed medical examination on the TuoTempo platform (Take Care s.r.l.).

### **3. TYPE OF DATA PROCESSED**

The Joint Controllers will process the following personal data:

- i. for the purposes of points (a) and (b) in point 2 above: first name, surname, registration number,
- ii. for the purposes referred to under c) in point 2 above: the sports medical certificate for non-competitive activity,
- iii. for the purposes referred to in point d) above: the data contained within the badge and those that can be deduced from the identity document that may be shown,
- iv. for the purposes of point (e) above: the email address.



#### **4. THE LEGAL BASIS OF THE PROCESSING**

For the purposes of letters a), b), d), e) and f) of point 2 above, processing of your personal data is necessary for the provision of services, pursuant to Art. 6 letter b) of the GDPR. For the purposes of letter c) of point 2 above, the processing is necessary to fulfil a legal obligation, pursuant to Art. 6 letter c).

#### **5. COMPULSORY OR OPTIONAL NATURE OF THE PROVISION OF DATA AND CONSEQUENCES OF REFUSAL TO PROVIDE DATA.**

The provision of your personal data is necessary for the achievement of the aforementioned purposes. Failure to provide your personal data, in part or inexactly, will make it impossible for you to access the Portal and to carry out sporting activities at the BSC.

#### **6. COMMUNICATION OF PERSONAL DATA**

Your personal data will be processed exclusively by persons authorised to process them pursuant to Article 29 of the GDPR and by legal entities and natural persons appointed pursuant to Article 28 of the GDPR as Data Processors, in compliance with the GDPR regulations, in order to carry out all processing activities necessary to pursue the purposes detailed in this Policy. Personal data may be disclosed to public bodies or judicial authorities, where required by law or to prevent or suppress the commission of a crime.

#### **7. DATA RETENTION PERIOD**

Your personal data, in compliance with the principles of purpose limitation and storage limitation, will be kept for the period of time strictly necessary for the pursuit of the indicated purposes. In particular: a) the data referred to in points i) ii) and iii) of point 3 above will be kept for the entire duration of your registration with Bocconi Sport Team, b) the sports medical certificate for non-competitive activities will be kept for one year.

#### **8. TERRITORIAL SCOPE OF PROCESSING**

Your personal data will be processed by the Joint Controllers within the territory of the European Union. Should it become necessary to process data outside the European Union, the entities that process your data for the purposes pursued by the University will be appointed as Data Processors and the transfer of personal data to such entities, limited to the performance of specific Processing activities, will be regulated in accordance with the GDPR. All necessary precautions will be taken in order to guarantee the total protection of personal data basing such transfer on the evaluation of appropriate safeguards among which, by way of example, adequacy decisions expressed by the European Commission, adequate safeguards expressed by the third party recipient pursuant to Article 46 of the GDPR. In any case, you may request further details from the Data Controllers if your personal data is processed outside the European Union, requesting evidence of the specific safeguards adopted.

#### **9. RIGHTS OF THE DATA SUBJECT**

Pursuant to Articles 15 et seq. of the GDPR you may, at any time, exercise the rights expressly granted to you and in particular obtain:

- confirmation as to whether or not personal data concerning you are being processed and to obtain access to the data and the following information (purpose of processing, categories of personal data, recipients and/or categories of recipients to whom the data have been and/or will be disclosed, storage period),



- the rectification of inaccurate personal data concerning you and/or the integration of incomplete personal data, including by providing a supplementary declaration,
- the erasure of personal data, in the cases provided for by the GDPR,
- the restriction of processing in the cases provided for by the privacy legislation in force,
- the portability of your data and/or request the direct transmission of your data to another data controller,
- object at any time, for reasons related to your particular situation, to the processing of personal data concerning you in full compliance with current privacy legislation, as well as for marketing and profiling purposes,
- revocation of any consent given. In any event, revocation of consent shall not affect the lawfulness of the processing based on consent before revocation. You may exercise your rights by contacting the following e-mail address, enclosing a copy of your identity document: [dpo@unibocconi.it](mailto:dpo@unibocconi.it). In any case, you will always have the right to lodge a complaint with the competent supervisory authority (Garante per la Protezione dei Dati Personali), pursuant to Art. 77 GDPR, if you believe that the processing of your data is contrary to the privacy legislation in force.

☐ I declare that I have read and understood this privacy policy on the processing of my personal data

