

## PRIVACY POLICY

PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU)  
2016/679



The Università Commerciale “Luigi Bocconi”, as Data Controller, will process your personal data only to the extent that they are indispensable in relation to the purpose of the research, in compliance with the provisions of the regulations in force on the protection of personal data and in accordance with the provisions set out in the general authorisations of the Italian Data Protection Authority (Prov. no. 497 of 13 December 2018).

### **1. Subjects of the processing activities**

The **Università Commerciale “Luigi Bocconi”**, with registered office in Via Sarfatti 25, Milan, in the person of its legal representative *pro tempore*, in the capacity of “Data Controller” (hereinafter referred to as “Data **Controller**” or “**University**”), informs 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”), in order to guarantee the rights, fundamental freedoms, and dignity of individuals, with particular reference to confidentiality and personal identity.

The Data Protection Officer ('**DPO**') can be reached at [dpo@unibocconi.it](mailto:dpo@unibocconi.it).

### **2. Categories and types of data processed**

The data processed by the University may include:

- personal information (name, surname, place of birth);
- contact information (address of residence and/or domicile);

### **3. Purpose and legal basis of processing**

In accordance with current data protection legislation, your personal data will only be processed to the extent that it is indispensable in relation to the objective of the research project, the dissemination of results and the administrative management of the project.

Personal data is processed on the basis of your specific and express consent, pursuant to Art. 6(1)(a) of the GDPR.

### **4. Recipients of personal data**

Within the scope of the above-mentioned purposes, the data may be communicated to [-].

Personal data collected in the course of the project will be shared with the following external parties:

- third companies, as specially appointed data processors, pursuant to Article 28 of the GDPR (Qualtrics and Microsoft);



The list of recipients of personal data may be requested from the Controller at the above-mentioned addresses.

## **5. Methods of data processing**

[-].

## **6. Personal data retention periods**

To enable the conduct of this research and all related operations and activities, including administrative ones, the data collected during the study will be recorded, processed and stored for [-].

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## **7. Data transfer to non-EU countries**

[-].

## **8. Nature of data provision and consequences of a refusal to provide the data**

The provision of data for the above-mentioned purposes is indispensable for the conduct of the research project, but optional and does not derive from a legal obligation. Refusal to provide them will not allow you to participate in the research project.

Please note that such a refusal will have no further consequences for you.

## **9. Dissemination of research results**

The data will be disseminated (e.g. through scientific publications, statistics and scientific conferences and/or the creation of databases, also in open access mode) only in a strictly anonymous and/or aggregate form and, in any case, in a manner that does not make you identifiable.

## **10. Rights of the data subject**

Participants in the research project, as Data Subjects, have the right to access their data at any time, pursuant to Articles 15-22 of the GDPR. In particular, each Data Subject has:

- a) the right to obtain confirmation as to whether or not personal data relating to him are being processed and, if so, to obtain access to them (Art. 15);
- b) the right to have one's personal data updated and/or corrected/supplemented (Art. 16);
- c) the right to obtain the deletion of one's personal data, in cases where this is permitted by the GDPR (Art. 17);
- d) the right to obtain the restriction of the processing of one's personal data, if one of the hypotheses provided for by the legislation in force applies (Art. 18);



- e) the right to object to the processing, except for those contained in documents that must be compulsorily kept by the University and unless there is an overriding legitimate reason for the University to continue the processing;
- f) the right to withdraw consent at any time, without prejudice to the lawfulness of the processing carried out before the revocation. In this case, no further data concerning the Data Subject will be collected, without prejudice to the use of any data already collected to determine, without altering them, the results of the search, or of any data which, either originally or following processing, cannot be traced back to an identified or identifiable person.

Without prejudice to any other administrative or jurisdictional recourse, the Data Subject also has the right to lodge a complaint (Art. 77 GDPR) with the Personal Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)), if he or she considers that the processing concerning him or her violates the applicable data protection regulations.

In order to exercise all the above-mentioned rights, the Data Subject may reach, in writing, the Scientific Project Manager, [-] (email: [-]) or the DPO at the above-mentioned addresses.

Milan, \_\_\_\_\_

