Bocconi

PRIVACY POLICY

PRIVACY POLICY FOR EMPLOYEES/COLLABORATORS PURSUANT TO ART. 13 OF REGULATION (EU) 2016/679

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**"), hereby informs you that your personal data, collected for the purposes of managing your employment or collaboration relationship with the University, will be processed in compliance with the legislation on the protection of personal data (EU Regulation 2016/679 - hereinafter referred to as "GDPR" - and D. Legislative Decree 196/2003 - hereinafter "**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

1. Purpose, legal basis of processing, categories of personal data and retention period

Purpose of processing	**Legal basis**	**Category of data processed**	**Retention period**
A. recruitment and selection procedures	• performance of a contract and/or execution of pre-contractual measures, Art. 6(1)(b) GDPR; • fulfilment of a legal obligation, Art. 6, par. 1, lett. c) GDPR and Art. 9, par. 2 lett. b) GDPR. In particular, L. 240/2010; current labour law and the current Collective Labour Agreement involving Bocconi Staff • Article 10 GDPR	• personal details (including family relationships with university employees, faculty and staff); • working and educational/training career; • judicial self-declaration; • health data • External references • Aptitude, language, digital skills assessment reports; • Personal mail	Faculty: for the entire period of the recruitment procedure and, limited to the application form and CV, stored for statistical and research purposes; Staff: for recruitment procedures through private negotiations, the CV and documentation produced is kept for two years
B. management of the employment relationship, including any disciplinary and judicial proceedings that may have been occured	• performance of a contract and/or execution of pre-contractual measures, Art. 6(1)(b) GDPR; • fulfilment of a legal obligation, Art. 6, par. 1, lett. c) GDPR and Art. 9, par. 2 lett. b) GDPR. In	• personal details; taxation; • banking; • data related to legal and economic career; • development and training; • judicial data; • health data; • membership of	For the entire period of the employment relationship and, with the application of due security measures, stored for statistical and archiving purposes.

Purpose of processing	Legal basis	Category of data processed	Retention period
	particular, L. 240/2010; current labour law and the current Collective Labour Agreement involving Bocconi Staff	trade unions; • institutional e-mail; • data related to electronic access in campus buildings; • data relating to attendance and absence from work; • UB fixed and mobile telephone numbers; • office address on campus; • magnetic card for access to services.	
C. management of the staff training	• performance of a contract and/or execution of pre-contractual measures , Art. 6(1)(b) GDPR;	• personal details; • career and titles/certifications acquired	For the duration of the employment relationship and, with the application of due security measures, kept for statistical and archiving purposes.
D. management of the welfare system for Staff	• performance of a contract and/or execution of pre-contractual measures, Art. 6(1)(b) GDPR;	• personal details; • salary and contribution data; • public and supplementary social security	For the duration of the employment relationship
E. performance evaluation management for Staff	• performance of a contract and/or execution of pre-contractual measures, Art. 6(1)(b) GDPR; • the current Bocconi Staff Collective Agreement.	• personal details; • career	For the duration of the employment relationship and, with the application of the necessary security measures, kept for statistical and archiving purposes.
F. performance evaluation management for Faculty	• performance of a contract and/or execution of pre-contractual measures, Art. 6(1)(b) GDPR; • fulfilment of a legal obligation, Art.	• personal details; • of legal and economic career	For the duration of the employment relationship and stored for statistical purposes

Purpose of processing	Legal basis	Category of data processed	Retention period
	6(1)(c) GDPR and Art. 9(2)(b) GDPR. In particular, L. 240/2010; current labour law and the current Collective Labour Agreement involving Bocconi Staff.		
G. managing the end of the employment relationship	• performance of a contract and/or execution of pre-contractual measures, Art. 6(1)(b) GDPR; • fulfilment of a legal obligation, Art. 6, par. 1, lett. c) GDPR and Art. 9, par. 2 lett. b) GDPR. In particular, Law 240/2010 and related internal regulations adopted by the University in application of the aforementioned law; current labour law and the current Collective Labour Agreement involving Bocconi Staff.	• personal details; • salary and contribution data; • public and supplementary social security	For as long as it is necessary to finalise the pension aspects and manage the annuities.

The provision of your personal data for the above purposes is mandatory. Any refusal to provide them may result in the failure to establish an employment relationship, the termination of an existing relationship, or the impossibility for the University to provide the services requested/delivered.

2. Recipients of personal data

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

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

c) The **data may also be communicated** to

- Certifying Administrations when checking the substitute declarations made for the purposes of Presidential Decree 445/2000;
- State Attorney's Office, Ministry of Foreign Affairs, Police Headquarters, Embassies, Public Prosecutor's Office in relation to residence permits, recognition of special status;
- Insurance bodies for accident practices;
- Revenue Agency for 730, and other purposes provided for by law;
- National and international public bodies, such as Ministries and Public Administration Offices, in connection with the performance of the University's institutional tasks;
- Natural or legal persons, external bodies and associations, including public and professional offices and companies (also outside the Italian Republic), for the execution of the contract with the person concerned.
- Public and private parties in execution of enforcement procedures and legal obligations in general.
- Other institutions partnered or connected with Bocconi (Istituto Javotte Bocconi, Egea).

3. Methods 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.

4. Data transfer 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 residing or located in States that do not belong to the European Union and that do not ensure adequate levels of protection will only be carried out subject to the conclusion between the University and said parties of specific agreements, containing appropriate safeguard clauses and guarantees for the protection of personal data - Standard Contractual Clauses - approved by the European Commission on 4 June 2021, 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 national and foreign Authorities on the protection of personal data.

5. Your rights

You have the right to access your data at any time, pursuant to Articles 15-22 of the Regulation. In particular, as a data subject you have:

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. cancellation, 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

Signature

_____