Bocconi

PRIVACY POLICY

FUNDRAISING

We 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) Sending communications by e-mail for promotional activities to raise funds	Consent given by the data subject (Art. 6(1)(a) GDPR)	• name • surname • email address	Until revocation of consent given
B) Calling and sending instant messaging including whatsapp for fundraising promotion activities	Consent given by the data subject (Art. 6(1)(a) GDPR)	• name • surname • email address • phone number	Until revocation of consent given
C) Donation Management	Performance of a contract to which the data subject is party (Art. 6(1)(b) GDPR)	• name • surname • email address • tax code • bank details	Ten years from the termination of the contract
D) Publication of personal data on the Bocconi University Annual Brochure/Donor Roll	Consent given by the data subject (Art. 6(1)(a) GDPR)	• name • surname	Until revocation of consent given
E) Communication of the donor's data to the beneficiary of its support	Consent given by the data subject (Art. 6(1)(a) GDPR)	• name • surname	Until revocation of consent given

4. 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.

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

5. Recipients 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. Alumni & Fundraising;
   2. Students Outreach & Support;
   3. Academic Affairs;
   4. Planning, Control & Valuation
   5. Administration & Treasury;
   6. Legal Affairs.

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

c) The data may also be communicated to

   - External community management and/or fundraising services;
   - Shipping companies;
   - Event organising agencies.

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 indicated in section 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. 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

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

□ I give my consent to the processing of my personal data for receiving communications by email for promotional activities for fundraising

□ I consent to the processing of my personal data for receiving calls and instant messaging including whatsapp for promotional activities for fundraising

□ I consent to the publication of my personal data on the University's annual Donor Roll Brochure

□ I give my consent for the disclosure of my personal data as Donor to the beneficiary