Bocconi

PRIVACY POLICY

SDA BOCCONI – SCHOOL OF MANAGEMENT
STUDENTS AND ALUMNI

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 contacted at the following mailbox: dpo@unibocconi.it

3. Processing of personal data

Purpose of processing	**Legal basis**	**Personal data processed**	**Conservation period**
A) Managing the delivery of MBA, specialised, DBA, executive, open and customised courses	• performance of a contract to which the data subject is party (Art. 6(1)(b) GDPR)	• name • surname • email address • tax code • gender • home address • nationality • freshman • attendance register • space utilisation log • films, voice recordings and images	• personal data relating to the student's career are stored in Esse3 without any time limit; • data on the student's experiential activities are retained for a period of six months from the end of the Masters course
B) Managing the utilisation of Career Development services of Master's Division students	• performance of a contract to which the data subject is party (Art. 6(1)(b) GDPR)	• *curriculum vitae* • name • surname • email address	• The retention of personal data, specifically the curriculum vitae, is subject to a three-year limitation period following the completion of the master's degree. Notification is issued on an

Purpose of processing	Legal basis	Personal data processed	Conservation period
			annual basis to the data subjects, requesting the updating of their curriculum vitae or the submission of an objection to the ongoing processing of their personal data.
C) Taxes and in particular for the calculation of amounts of taxes and/or refunds and exemptions due	• performance of a task in the public interest (Art. 6(1)(e) GDPR)	• name • surname • email address • gender • tax code • home address • nationality • freshman • tax and banking data	• 10 years
D) Sending electronic communications to participants for orientation purposes, invitations to events and course promotion	• Legitimate interest (Art. 6(1)(F) GDPR) art. 130 comma 4 D.Lgs. 196/03	• name • surname • email address	• Until *the opt-out* is exercised
E) Calls and whatsapp-type messages for orientation purposes, invitations to events and	• Consent of the data subject (Art. 6(1)(a) GDPR)	• name • surname • telephone number	• Until revocation of any consent given

Purpose of processing	Legal basis	Personal data processed	Conservation period
course promotion			
F) sending communications to Alumni in Italy and worldwide (Chapter), including initiatives to support the University.	• performance of a contract to which the data subject is party (Art. 6(1)(b) GDPR)c	• name • surname • e-mail address • tax code • residence/domicile /work address • nationality • freshman • date, grade • company where he works and job title	• The data will be processed after graduation and/or graduation. The data will be processed until the person concerned objects to receiving communications from the University
G) 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 contract to which the data subject is party (Art. 6(1)(b) GDPR)	• name • surname • email address • tax code • residence/domicile /work address • nationality • freshman • date, grade • company where he works and job title	• The data will be processed until the person concerned objects to receiving communications from the University
H) collection of information on food allergies or intolerances for the management of meals organised at events or courses	• Consent given by the data subject (Art. 6(1)(a) GDPR)	Allergies and/or intolerances indicated by the user during registration	• For the time of the event or course management

4. Modalities of data processing

Personal data is processed by manual, computerised and telematic means in accordance with the stated purposes, 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) departments 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. SDA Offices

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
   - Organisations, including non-European ones, that manage ranking and accreditation with related auditing for institutional purposes
   - Companies, organisations or bodies where relative visits or study tours are organised

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 appropriate safeguard clauses and guarantees for the protection of personal data - Standard Contractual Clauses - approved by the European Commission, as provided for by Chapter V, Art. 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 processing based on 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 the purpose of receiving guidance communications, event invitations, and promotion of SDA courses via messages and telephone contacts

□ I consent to the processing of my personal data concerning food intolerances or allergies