



# UNIVERSITÀ DEGLI STUDI GUGLIELMO MARCONI

**Policy on the processing of personal data of users who intend to enroll and of under graduated, graduated, post graduated and doctoral students of the “Università degli studi Guglielmo Marconi”.**

The General Data Protection Regulation (EU) 2016/679 (GDPR) is a regulation in EU law on data protection and privacy in the European Union (EU) and the European Economic Area (EEA) and provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to art. 13 and 14 of the GDPR, we inform you that:

**DATA CONTROLLER:** the data controller of your personal data is Guglielmo Marconi University (Ph. 06.377251 - Fax 06.37725212 - e-mail: [info@unimarconi.it](mailto:info@unimarconi.it)), based in Rome, Via Plinio, 44 in the person of pro-tempore Legal Representative, Prof. Alessandra Briganti.

**DATA PROTECTION MANAGER:** the Data Protection Officer (DPO) is Dr. Antonio Domenico Brasca (e-mail: [dpo\\_gdpr@unimarconi.it](mailto:dpo_gdpr@unimarconi.it)).

**PURPOSE OF THE PROCESSING AND LEGAL BASIS:** in compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance and necessity referred to in art. 5, paragraph 1 of the GDPR, the Guglielmo Marconi University, in its capacity as Data Controller, will process personal data voluntarily provided, at the time of enrollment or during the course of training, by the data subject and relating to the data subject and/or his/her family members, or collected by third parties (INPS) or formed by the University relating to the career exclusively of the data subject for purposes related to the performance of institutional tasks of public interest vested in the data controller.

In particular, the above data will be collected and processed, manually, on paper and computerized, through their inclusion in paper and / or computer archives for the administrative and educational management of your career for the pursuit of the following purposes:

- a) pre-evaluation of the study and work path for the purposes of credits recognition;
- b) enrollment and attendance in college courses;
- c) university career management including study abroad and/or double degree programs;
- d) management of curricular and extracurricular internships;
- e) calculation of tax amounts due;
- f) obtaining a degree;
- g) use of telematic and e-mail services;
- h) use of library services;
- i) access to laboratories and other protected facilities;
- j) sending communications relating to your university career;
- k) application of safety measures in the workplace in accordance with the provisions of Legislative Decree 81/2008;
- l) disciplinary proceedings against students;



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- m) surveys for the evaluation of teaching and customer satisfaction;
- n) archiving and storage of data relating to university careers (studies, positions held, qualifications obtained);
- o) elections of student representatives and for the possible performance of tasks inherent to the elected office held by the person concerned in the governing bodies of the University;
- p) outbound orientation and job placement activities;
- q) use of grants, benefits and services related to the right to university study;
- r) statistics and historical and scientific research, on aggregated or anonymous data, for the purposes of monitoring and compulsory communications related to the institutional activity of the University, without the possibility of identifying the user;
- s) direct marketing by the Data Controller and/or by third parties to whom the data are communicated, in particular for sending advertising or direct sales material, carrying out market research or commercial communication both with automated contact methods (electronic mail, other remote communication systems via communication networks such as, purely by way of example: sms, mms, whatsapp) and traditional ones (paper mail).

## **PARTICULAR DATA CATEGORIES**

For the purposes of processing indicated above, in specific situations, particular categories of data may be collected and processed at the request of the person concerned, such as:

- racial and ethnic origin (for non-EU citizens, and for refugee status);
- health status (in case of pregnancy or for disabled students);
- judicial data (for users and detained students);
- sexual life (for possible rectification of sex attribution).

## **CATEGORIES OF DATA RECIPIENTS AND POSSIBLE DATA TRANSFER:**

The data processed for the purposes mentioned above will be communicated or will be accessible to the teachers of the chosen course of study and to the employees and collaborators assigned to the competent offices of the University of Guglielmo Marconi, who, in their capacity as representatives for the protection of data and / or system administrators and / or processors, will be adequately instructed by the owner.

The University may also communicate the personal data to other administrations which need to process the same data for any procedures of their own institutional competence, as well as to all those subjects to whom, in the presence of the relative prerequisites, communication is obligatorily foreseen by Community provisions, norms of law or regulations, as well as to insurance bodies for any accident practices.

Always in order to carry out the institutional tasks of public interest of the University, this may communicate the collected personal data to other public subjects who manage the disbursement of research contributions and/or scholarships or who promote studies and research, projects for university development, services for the right to study.

The University may communicate the personal data of which it is the owner to concessionaires of public services and/or private parties, with whom relations will be defined by a separate legal act, to allow the interested party to take advantage of the services and benefits offered by the University.



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For educational courses that include internship activities, the data will be communicated to the competent offices of the Hosts.

For educational courses, active or that may be activated in the future by the University, which include study experiences or internships or job placement (mobility) in European countries and for degree courses that provide for the award of a double degree with universities located in European countries, the data will be communicated to the competent university administrations and institutions that will treat them, for their own purposes, as holders in accordance with the GDPR.

For educational courses, active or that may be activated in the future by the University, that include study experiences (mobility) or internships or job placement in European countries and for courses that provide for the award of a double degree with universities located in non-EU countries (third countries), the Data Controller assures as of now that the transfer of data collected for the pursuit of these purposes will take place only if a decision of adequacy has been adopted by the European Commission with regard to the third country (art.45 GDPR).

**If no such adequacy decision has been made, the transfer of your data to a third country will only take place with your express consent.**

The management and storage of personal data collected by the Guglielmo Marconi University takes place on servers located within the University and/or on external servers of suppliers of certain services necessary for the technical-administrative management which, for the sole purpose of the requested service, may come to know the personal data of the interested parties and who will be duly appointed as Data Processors according to art. 28 of the GDPR.

## **DATA RETENTION PERIOD**

Personal data concerning the student's university career will be kept indefinitely according to the archiving obligations imposed by the regulations in force.

The data collected for the use of services and for communications will be kept for the time established by the regulations in force and in any case for the time strictly necessary.

The data relating to any disciplinary proceedings to which you are subjected will be kept indefinitely in relation to the final measure and for 5 years in case of revocation or cancellation of the final measure.

## **RIGHTS OF THE INTERESTED PARTY**

The interested party has the right to request the University of Guglielmo Marconi, as Data Controller, pursuant to Articles 15, 16, 17, 18, 19 and 21 of the GDPR:

- access to one's own personal data and to all the information referred to in Article 15 of the GDPR;
- the rectification of one's own personal data that is inaccurate and the integration of incomplete data;
- the deletion of one's own data, except for those contained in records that must be compulsorily kept by the University and unless there is a legitimate prevailing reason to proceed with the processing;



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- the limitation of processing in the cases referred to in Article 18 of the GDPR.

The interested party also has the right:

- to oppose the processing of his/her personal data, without prejudice to what is provided for with regard to the necessity and obligatory nature of the data processing in order to be able to use the services offered;
- to revoke any consent given for non-compulsory data processing, without prejudice to the lawfulness of the processing based on the consent given before revocation.

## **MODALITIES OF EXERCISING RIGHTS:**

The interested party may exercise all the rights referred to above by sending an e-mail to the Data Protection Officer at the following e-mail address: [dpo\\_gdpr@unimarconi.it](mailto:dpo_gdpr@unimarconi.it)

## **COMPLAINT:**

The data subject is also entitled to lodge a complaint with the Data Protection Authority pursuant to Article 77 of the GDPR (<https://www.garanteprivacy.it>).

## **COMPULSORY OR NON-COMPULSORY CONFERMENT OF DATA:**

The provision of personal data for the purposes referred to in letters a) to r) is mandatory for the establishment of the relationship between the student and the University.

The provision of personal data for the purposes referred to in letter s) is optional.

The processing referred to in letter r), taking place on aggregated or anonymous data, does not provide for the application of the GDPR.

The processing referred to in point s), takes place only with the explicit consent of the data subject.

By signing below, the interested party declares that he/she has read and understood the above information.

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## **EXPLICIT CONSENT TO THE PROCESSING OF PERSONAL DATA FOR PROMOTIONAL AND MARKETING PURPOSES**

The Data Subject, having been informed of all aspects relating to the collection, processing and storage of his or her Personal Data and informed of his or her rights pursuant to and by effect of the G.D.P.R. and applicable national provisions, expressly, voluntarily, freely and unequivocally gives and manifests his or her consent for the promotional and marketing purposes referred to in letter s), paragraph PURPOSE OF PROCESSING AND LEGAL BASIS, of the above information notice.

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