



UniSR

Università Vita-Salute
San Raffaele

PRIVACY POLICY

Università Vita-Salute San Raffaele, with registered office located in Milan, Via Olgettina no. 97187560152 (hereinafter referred to as "**UniSR**") undertakes to constantly safeguard the privacy of the data subjects. This information notice is aimed at disclosing the privacy policy implemented by UniSR in order to: **(i)** explain to the data subjects the terms and conditions pursuant to which their personal data are processed; and **(ii)** allow the data subjects to provide their explicit and conscious consent to the processing of their personal data. The above in compliance with the provisions set forth under both Article 13 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as "**Regulation**") and the Italian Legislative Decree 30 June 2003, no. 196 (hereinafter referred to as "**Privacy Code**").

The information and the personal data supplied or otherwise collected shall be processed in accordance with the provisions of both the Regulation and the Privacy Code and in compliance with the confidentiality obligations inspiring UniSR activity.

According to the provisions of both the Regulation and the Privacy Code, any processing of personal data carried out by UniSR shall be lawful, fair and transparent and shall be consistent with the following principles: limitation of scopes and conservation, minimization of data, exactness, integrity and confidentiality.

DATA CONTROLLER AND DATA PROTECTION OFFICER

The controller of the personal data is Università Vita-Salute San Raffaele.

According to **(i)** Article 37 of the Regulation and **(ii)** the CODAU Guidelines, by resolution of the Board of Directors dated 22 January 2018, UniSR appointed GSD SISTEMI E SERVIZI S.C.A.R.L., with registered office located in Milan, Corso di Porta Vigentina no. 18, VAT no. 06959200962 (hereinafter referred to as "**GSD**"), as data protection officer (hereinafter referred to as the "**DPO**").

The professional indicated by GSD for the purposes of the carrying out of the DPO activities is Mr. Gabriele Tettamanti, born in Como, on 8 August 1980, Tax Code TTTGRL80M08C933F.

The DPO is available for any information regarding the data processing carried out by UniSR.

The contact details of the Data Processor and of the DPO are the following: privacy@univr.it

CATEGORIES, NATURE AND PURPOSES OF THE PROCESSED DATA

The personal data collected by UniSR for institutional purposes - ID data, contact data, scholarship data, carrier data, economic data, sensitive and judicial data - will be processed for institutional purposes only, including the possible publication of the personal data on UniSR website, for the purposes of all fulfilments imposed to UniSR by any applicable laws in compliance with the Regulation and the Privacy Code as well as with the aforementioned principles of limitation of scopes and conservation, minimization of data, exactness, integrity and confidentiality in connection with the purposes for which such data are processed.

The personal data could be also processed for historic, scientific purposes in compliance with any applicable laws and deontological code.

As per the so called sensitive data (*id est* personal data allowing the disclosure of racial or ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or organizations of a religious, philosophical, political or trade-unionist character, as well as personal data disclosing health and sex life) and judicial data (*id est* personal data disclosing the measures referred to in Section 3(1), letters a) to o) and r) to u), of Presidential Decree no. 313 of 14 November 2002 concerning the criminal record office, the register of offence-related administrative sanctions and the relevant current charges, or the status of being either defendant or the subject of investigations pursuant to Sections 60 and 61 of the Criminal Procedure Code) within the employment relationship UniSR may collect any of the following data:

- a) data regarding students and/or their relatives affected by any handicap or economic data for the purpose of any control and/or granting of any benefit provided under applicable laws and/or management of extraordinary contributions;
- b) data concerning the status of refugee;
- c) data concerning pregnancy for academic purpose and for the purpose of the granting of any benefit provided under applicable laws;
- d) personal data allowing the disclosure of political opinions, membership of parties, trade unions, associations or organizations of a religious, philosophical, political or trade-unionist character,
- e) sensitive and judicial data concerning disciplinary proceedings against students;
- f) data regarding handicap;

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- g) data regarding health necessary for any eligibility evaluation of the students, also through specific medical visits, and for safety measures.

The sensitive and judicial data referred to above, regarding academic activities and the inscriptions of students collected from the data subject or from third parties, shall be processed through paper and electronic support.

Please find below the main legal provisions justifying the data processing of sensitive and judicial personal data: Royal Decree no. 1592/1933 and subsequent amendments; Royal Decree no. 1269/1938 and subsequent amendments; Presidential Decree no. 382/1980; Law no. 168/1989; Law no. 398/1989; Law no. 341/1990; Law no. 390/1991; Law no. 104/1992; Ministerial Decree no. 224/1999; Italian Legislative Decree no. 445/2000; Law no. 148/2002; Ministerial Decree no. 270/2004; Presidential Decree no. 334/2004; Ministerial Decree no. 142 of 25/3/1998 and Law 24 giugno 1997, no. 196; Presidential Decree 9 April 2001; Law no. 14 February 2003, no. 30; *Contratto Istituzionale Socrates Erasmus*; By-laws, UniSR Regulations; Regional Laws in force.

MANDATORY COLLECTION OF PERSONAL DATA

Within the aforementioned principles of limitation of scopes, conservation and minimization of data, please be informed that the collection of personal data is mandatory for the purpose of the relationship with UniSR.

PROCESSING

Personal data are processed with both handwriting and electronic systems, in strict compliance with the scope of the processing, through adequate safety measures and for the period provided under applicable laws.

TRANSFER OF PERSONAL DATA

In compliance with the aforementioned principles of lawfulness, fairness and transparency, limitation of scopes and conservation, minimization of data, exactness, integrity and confidentiality, the personal data collected by UniSR could be transferred to third countries, including extra UE countries.

In such cases UniSR undertakes to preliminarily verify and impose to the third subject to which the personal data should be transferred the compliance with the principles and the applicable provisions pursuant to the Regulation and the Privacy Code. To such purpose UniSR could impose to the third subject to which the personal data are transferred to sign a specific deed of appointment in accordance with Article 29 of the Privacy Code and Article 28 of the Regulation.

RIGHTS OF THE DATA SUBJECT

At any time you are entitled to ask UniSR to have access to your personal data, to modify or cancel the same or to object to their processing according to Article 20 of the Regulation. You are further entitled to request for a restriction of processing according to Article 18 of the Regulation, and for the portability according to Article 20 of the Regulation.

Any request should be addressed in writing to the Data Controller and the DPO.

You are always entitled to make a claim before the competent supervisory authority (*Garante per la Protezione dei Dati Personali*) according to Article 77 of the Regulation, should you consider any data processing being in breach of the applicable laws.

- I hereby declare having read and understood the information notice regarding the processing of personal data by Università Vita-Salute San Raffaele and hereby expressly acknowledge to the processing of such personal data.

[Name and Surname]

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