

## Privacy Policy on the Processing of Personal Data Completed Through the SensusAccess Service Pursuant to Article 13 of Regulation (EU) 2016/679

Università Commerciale “Luigi Bocconi,” with registered offices at Via Sarfatti 25, Milan, in the person of its *pro tempore* legal representative in the capacity of "Data Controller" (hereinafter "**Data Controller**" or "**University**"), hereby informs 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 Legislative Decree no. 196/2003 and subsequent amendments), in order to guarantee the rights, fundamental freedoms, as well as the dignity of individuals, with particular reference to confidentiality and personal identity. We inform you that if the activities provided to you require the processing of third party personal data in your ownership, it will be your responsibility to ensure that you have complied with the provisions of the law regarding the interested parties in order to make their processing legitimate on our part.

The person in charge for the protection of personal data (hereinafter, "**DPO**") can be reached at [dpo@unibocconi.it](mailto:dpo@unibocconi.it).

### 1. Categories and types of data subject to processing by the "SensusAccess" service (hereinafter also referred to as "Service")

The data processed in the context of the processing carried out through the Service are:

- Email addresses of students, faculty and staff;
- Navigation data, acquired during the use of the service;
- Anonymous session cookies.

### 2. Purpose and legal basis of the processing

In compliance with current legislation on the protection of personal data, Personal Data will be stored, collected and processed in order to:

- a) allow access to the Service (art. 6, par. 1, letter b) GDPR);
- b) comply with the provisions of the law, as well as regulations, codes, procedures approved by authorities and other competent institutions (art. 6, par. 1, letter c) GDPR).

Furthermore, for the pursuit of its legitimate interests (art. 6, par. 1, letter f) of the GDPR), the University may use the information collected also for the performance of several internal activities such as, for example, the control of its own security, the verification of compliance with the law, provided that the interests or fundamental rights and freedoms of the Data Subject requesting the protection of personal data.

The provision of your personal data for the purposes indicated above is optional but your refusal to provide your data will make it impossible to use the Service.

### 3. Communication of personal data

Within the scope of the aforementioned purposes, the data will only be disclosed to the Service provider, Sensus Aps (Københavnsvej 27, 2 DK-3400 Hillerød), appointed as Data Processor pursuant to art. 28 GDPR.

### 4. Methods of data processing

In relation to the indicated purposes, the processing of personal data takes place using manual, IT and telematic tools designed to be strictly related to the purposes themselves and, in any case, with methods that guarantee the security and confidentiality of the data, in addition to compliance with specific obligations sanctioned by law.

Your personal data will be processed only by personnel authorized to process it pursuant to art. 29 of the GDPR for the performance of their work duties.

#### **5. Storage times for personal data**

Your personal data will be kept only for the time necessary for the purposes for which they are collected, in compliance with the minimization principle pursuant to art. 5 (1) letter c) of the GDPR and in any case no later than 7 (seven) days from the request for the document to be converted.

#### **6. Transfer of data to non-EU countries**

There is no transfer of personal data to countries outside the European Union, as the provider's data centers are in Denmark.

#### **7. Your rights**

You have the right to access the data concerning you at any time, pursuant to art. 15-22 of the GDPR. In particular, as a Data Subject, you have:

- a) the right to obtain confirmation as to whether or not personal data concerning you are being processed and, in this case, to obtain access to it (art. 15);
- b) the right to obtain the updating and/or correction/integration of your personal data (art. 16);
- c) the right to obtain the cancellation of your personal data, in cases where this is permitted by the GDPR (art. 17);
- d) the right to obtain the limitation of the processing of personal data, if one of the situations provided for by current legislation occurs (art. 18);
- e) the right to receive the personal data concerning you provided to the Data Controller in a structured format, commonly used and readable by an automatic device, and you have the right to transmit such data to another data controller without impediments by the Data Controller who provided it if i) the processing is based on consent pursuant to art. 6, par. 1, letter a), or art. 9, par. 2, letter a), or in a contract pursuant to art. 6, par. 1, letter b); and the processing is carried out by automated means (art. 20).

Without prejudice to any other administrative or judicial appeal, you also have the right to lodge a complaint (art. 77 of the GDPR) to the Privacy Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)), if you believe that the processing concerning you violates the current legislation on the protection of personal data.

Requests must be sent in writing to the Data Controller or the DPO at the addresses indicated above.

**Last updated 3 November 2021**