



## UNIVERSITY RESIDENCES AND ACCOMMODATION ASSIGNMENT SERVICES

### **Privacy policy in compliance with article 13 of EU Reg, 2016/679 - GDPR** *Policy for the Processing of personal data collected from the person concerned*

#### **1. DATA PROCESSORS**

The DATA CONTROLLER pursuant to articles 4 and 24 of EU Reg. 2016/679 is the **International University of languages and Media IULM**, Via Carlo Bo 1 - 20143 Milan, in the person of its pro tempore legal representative.

The University, in accordance with art. 37-39 Reg. UE 2016/679, appointed Data Protection Officer, who can be contacted at the following email address: [dpo.iulm@dpoprofessionalservice.it](mailto:dpo.iulm@dpoprofessionalservice.it)

#### **2. PURPOSE AND LAWFULNESS OF PROCESSING**

Personal data shall be processed lawfully, in compliance with the provisions of art. 6 lett. B) of EU Reg. 2016/679, for the following purposes:

- Management of requests for accommodation in the university campus, assignment of housing and related administrative and accounting activities (e.g. billing);

#### **3. DATA RECIPIENTS OR RECIPIENT CATEGORIES**

The supplied personal data may be transferred to the recipients mentioned in art. 28 of EU Reg. 2016/679, who shall process them in the capacity of data processors and/or as individuals operating under the authority of the Controller and Processor, in order to comply with the relevant contracts or purposes. More specifically, data may be transferred to recipients in the following categories:

- University offices in charge of accommodation;
- companies supplying their services in the Campus;
- companies providing hotel stays and related services to students;
- external bodies providing integrated student services and promoting the right to education;
- authorities of competent jurisdiction, for the fulfilment of legal obligations, on request;
- insurance companies, for the processing of accident claims;
- subjects providing management services for the computer system and communication networks of the International University of languages and Media IULM (including e-mail and the IULM web platform).

Subjects belonging to the abovementioned categories shall become the Data Processors, or shall operate in a completely autonomous way, as Data Controllers in their own right. The list of designated Data Processors is constantly updated and is available at the **International University of languages and Media IULM** main office.

#### **4. DATA TRANSFER TO THIRD COUNTRIES AND/OR INTERNATIONAL ORGANISATIONS**

Personal data **will not be transferred abroad** within or outside the European Union.

#### **5. STORAGE PERIOD OR CRITERIA**

Data shall be processed automatically and/or manually, in a manner and with tools that ensure maximum security and confidentiality, by specifically appointed subjects.

In compliance with the provisions of art. 5 par. 1 lett. e) of EU Reg. 2016/679, the collected personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. The storage of personal data is determined on the basis of criteria detailed in the guidelines provided by CODAU (Association of General Managers of Italian Universities). Alternatively, and in compliance with the regulatory requirements, different storage periods may be provided for in the Regulations/ Statutes of the International University of languages and Media IULM, available upon request to the Data Controller.

#### **6. PROVISION AND REFUSAL OF PERSONAL DATA**

Provision of personal data for the purposes of paragraph 3 of this policy is necessary in order to manage the information activities described above and connected with the assignment of university lodgings, upon request.



Any failure to provide relevant personal data shall entail the impossibility to manage the activities mentioned in paragraph 3 hereof.

#### **7. RIGHTS OF THE DATA SUBJECTS**

You shall be able to exercise your rights under articles 15, 16, 17, 18, 19, 20, 21 and 22 of EU Regulation 2016/679 by writing to the Data Controller, the Data processor or the Data Protection Officer at the following address: [privacy@iulm.it](mailto:privacy@iulm.it)

You shall have the right to obtain, at any moment, from the controller, access to your personal data, and their rectification or erasure, as well as the restriction of their processing. Moreover, you have the right to object to the processing of your data (including automated processing, such as, for instance, profiling) and to receive the personal data concerning you. Without prejudice for any other administrative and jurisdictional recourse, if you believe that the processing of your personal data violates the provisions of EU Reg. 2016/679, you have the right, pursuant to art. 15 letter f) of said EU Reg. 2016/679, to lodge a complaint with the Data Protection Authority and, pursuant to art. 6 paragraph 1 letter a) and to art. 9 paragraph 2 letter a), to revoke your consent to the processing at any time.

In case of a request for data portability, the Data Controller shall provide your personal data to you in a structured, commonly used and machine-readable format, without prejudice for the provisions of paragraphs 3 and 4 of art. 20 of EU Reg. 2016/679.

Updated on: 6<sup>th</sup> March 2023