



PRIVACY POLICY – UNIVERSITY THEMATIC WEBSITES

Information notice pursuant to and for the purposes of art. 13 of Regulation (EU) 2016/679 (GDPR)

WHY THIS INFORMATION?

In accordance with Regulation (EU) 2016/679 (hereinafter "GDPR"), this page describes the methods of processing personal data. This information is provided pursuant to art. 13 GDPR. The information is not to be considered valid for other third-party websites, which may be consulted via links on this website, for which no responsibility is assumed.

Processable personal data

- **Personal data** : any information relating to an identified or identifiable natural person (' **data subject** '); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (C26, C27, C30 GDPR).
- **User data.**
- **Browsing data** : the computer systems and software procedures used to operate this site acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This category of data includes IP addresses or domain names of computers and terminals used by users, URI/URL (Uniform Resource Identifier /Locator) addresses of requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the user's computer environment.
- **Data communicated voluntarily:** the optional, explicit and voluntary sending of messages to the contact addresses indicated on this site and/or the completion of data collection forms entails the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data entered.

Information about the processing of personal data carried out through Social Media platforms

Regarding the processing of personal data carried out by Social Media platforms used by the Data Controller, please refer to the information provided by them through their respective privacy policies. The Data Controller processes the personal data provided by users through the pages of the dedicated Social Media platforms, to manage interactions with users (comments, public posts, etc.) and in compliance with current legislation.

Specific information

Specific information may be present on the pages of the Site in relation to particular services or processing of the data provided.

COOKIES AND OTHER TRACKING SYSTEMS. WHAT ARE THEY? WHAT ARE THEY USED FOR?

For Cookies and other tracking systems, see the cookie policy reported in the footer of the site and at the following link: <https://tneimpact.eu/cookie-policy>.

WHO IS THE DATA CONTROLLER? HOW TO CONTACT HIM?

The data controller, pursuant to articles 4 and 24 of EU Reg. 2016/679, is LUMSA Libera Università Maria Ss. Assunta, with registered office in via della Traspontina , 21 – Rome, in the person of the special attorney. Contact details of the data controller: privacy@lumsa.it.

As a preliminary matter, it is stated that all the activities carried out by the data controller as a University (regardless of the specific nature and legal form assumed ¹), are part of the pursuit of purposes of public interest (see art. 1, paragraph 1, of law no. 240 of 2010, referring to both state universities and non-state universities), a purpose which consists in the promotion of study and culture in general, through free teaching (see art. 33 of the Constitution and 1 of the aforementioned law of 30 December 2010, no. 240), education and training in the scholastic, professional, higher or university fields.

¹v. provv. n. 317 of 16 September 2021 - Injunction order against the "Luigi Bocconi" Commercial University of Milan [9703988] of the Guarantor for the protection of personal data - <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/9703988>;

see Council of State, Consultative Section for Normative Acts, Section Meeting of 9 May 2019, no. 1433/2019, which follows the Consultative Section for Normative Acts, Section Meeting of 31 January 2019, no. 370/2019.



Given the above, the processing of personal data reported in the tables below, as well as the related purposes pursued, can be traced back to the "execution of a task of public interest or connected to the exercise of public powers" (art. 6, par. 1, letter e), and, with regard to the special categories of data, art. 9, letter g), of EU Reg. 2016/679).

HAS A DATA PROTECTION OFFICER BEEN APPOINTED? WHAT ARE HIS CONTACT DETAILS?

The University has also appointed the Data Protection Officer (RPD/DPO) pursuant to articles 37 – 39 of EU Reg. 2016/679, whose contact details are given below: email dpo.lumsa@dpoprofessionalservice.it.

PURPOSE OF THE PROCESSING, LEGAL BASIS, DATA RETENTION PERIOD, NATURE OF THE PROVISION

PURPOSE OF THE PROCESSING	LEGAL BASIS	DATA RETENTION PERIOD	NATURE OF THE PROVISION
Navigation on this website. The data necessary for the use of web services are also processed for the purpose of: •obtain statistical information on the use of services (most visited pages, number of visitors per time slot or day, geographical areas of origin, etc.); •check the correct functioning of the services offered. The data will be used to ascertain responsibility in the event of hypothetical computer crimes against the site.	The processing is necessary for the pursuit of the legitimate interest of the data controller or third parties, provided that the interests or fundamental rights and freedoms of the data subject which require the protection of personal data do not prevail, taking into account the reasonable expectations of the data subject and the activities strictly necessary for the functioning of the site and navigation itself. (Art. 6, par. 1 letter f and C47 of the GDPR) Data subjects are guaranteed the possibility of obtaining, upon request, information on the balancing test performed.	Browsing data will be stored for the duration of the browsing session. In any case, they will not persist for more than seven days (except for any need to ascertain crimes by the Judicial Authority).	Providing data is necessary for browsing the website.
Use of cookies and similar technologies. See the cookies policy in the footer of the site.	For cookies and similar non-technical technologies, the processing is based on consent to the processing of personal data (art. 6 par. 1 lett. ae C42, C43 of the GDPR). Consent is given through the banner and the site's cookie policy.	See the cookies policy in the footer of the site .	See the cookies policy in the footer of the site .

In addition to navigation, personal data will be processed for:

PURPOSE OF THE PROCESSING	LEGAL BASIS	DATA RETENTION PERIOD	NATURE OF THE PROVISION
A) Provide feedback to data subjects in the event of contact or information requests (e.g. sending information material relating to projects, initiatives, master's and degree courses, service communications , etc.).	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (C44). Art. 6 par. 1 letter b) of the GDPR.	For the time necessary to provide feedback to the request and in any case no longer than 1 year.	The provision is necessary. Failure to provide the necessary data will make it impossible to contact data subjects and provide them with



PURPOSE OF THE PROCESSING	LEGAL BASIS	DATA RETENTION PERIOD	NATURE OF THE PROVISION
			the requested information.
B) Manage requests from data subjects, pursuant to articles 15 et seq. of the GDPR (rights of the data subjects).	Processing is necessary for compliance with a legal obligation to which the controller is subject (C45). Article 6 par. 1 letter c) of the GDPR.	5 years from the closure of the request, barring disputes.	The provision of personal data is mandatory, as it is essential to be able to fulfill legal obligations.

3. TO WHOM WILL THE PERSONAL DATA BE COMMUNICATED? DATA RECIPIENTS

Personal data will be communicated to subjects who will process the data as independent Data Controllers, or Data Processors (art. 28 GDPR) and processed by individuals (art. 29 GDPR) who act under the authority of the Data Controller and the Processors on the basis of specific instructions provided in order to the purposes and methods of processing. The data will be communicated to recipients belonging to the following categories:

- Entities based in Italy, who provide services for the website and communication networks, including email, hosting and website management;
- Entities based in Italy, who provide services for the management of the activities indicated above in the purposes;
- Freelance professionals, firms or companies, based in Italy, in the context of assistance and consultancy relationships;
- Competent authorities for compliance with legal obligations and/or provisions of public bodies, upon request.

The list of Data Processors pursuant to art. 28 is available by writing to privacy@lumsa.it or to the other contact details indicated above.

4. WILL THE DATA BE TRANSFERRED TO NON-EEA COUNTRIES?

Personal data will not be transferred to countries located outside the European Economic Area. In particular, it is specified that the data processed for hosting, management, development and maintenance services of the site will be collected and processed in Italy.

In any case, data subjects are free to request further information on the transfers made and on the related guarantees, pursuant to articles 44 et seq. of the GDPR, by contacting the data controller at privacy@lumsa.it.

5. IS THERE AN AUTOMATED PROCESS?

Personal data will be subjected to traditional manual, electronic and automated processing. It is specified that no fully automated decision-making processes are carried out.

6. WHAT ARE YOUR RIGHTS? HOW CAN YOU EXERCISE THEM?

Data subjects may assert their rights as expressed in articles 15 et seq. of the GDPR by contacting the DPO/RPD at the email address: dpo.lumsa@dpoprofessionalservice.it or at the PEC address dpo.lumsa@pec.dpoprofessionalservice.it or by contacting the Data Controller at the email address to privacy@lumsa.it, or by writing to the contacts indicated above.

The data controller guarantees the data subjects the possibility to request, at any time, access to their personal data (art.15), rectification (art.16), cancellation of the same (art.17), limitation of the processing (art.18). The data controller communicates (art. 19), to each of the recipients to whom the personal data have been transmitted, any rectifications or cancellations or limitations of the processing carried out. The data controller communicates to the data subjects who request it such recipients.

The data controller guarantees the right to portability (art.20) and, in the event of requests pursuant to art.20, will provide the data subjects with the data in a structured, commonly used and machine-readable format.

The data subjects are recognized the right to object (art.21), at any time, to the processing of data based on legitimate interest or on the execution of a task of public interest or connected to the exercise of public powers of which the data controller is invested, by writing to the contacts listed above with the subject "opposition". In the event of exercising the right to object to the processing based on legitimate interest, the data controller recognizes the possibility for the data subjects to obtain, upon request, information on the balancing test carried out.

Data subjects are entitled to withdraw their consent, without prejudice to the lawfulness of the processing based on the consent given before its withdrawal.

In the event that the data subjects believe that the processing of personal data carried out by the Data Controller is in violation of the provisions of Regulation (EU) 2016/679, they are free to submit a complaint to the [national supervisory authority](#), in particular in



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the member state in which they habitually reside or work, or in the place where the alleged violation of the Regulation occurred (Privacy Guarantor <https://www.garanteprivacy.it/>), or to take appropriate legal action.

7. CHANGES TO THE INFORMATION NOTICE

The data controller reserves the right to modify, update, add or remove portions of this privacy policy at its discretion and at any time. In order to facilitate such verification, the information will contain the indication of the update date.

Updated: March 13, 2025