

Occasional Contacts Privacy Policy

Information for those concerned,

Data collected from you will be processed according to the following principles: lawfulness, fairness and transparency; purpose limitation; data minimisation; accuracy; storage limitation; integrity and confidentiality.

UNIVERSITA' COMMERCIALE "LUIGI BOCCONI" (hereinafter referred to as "Bocconi University"), having its registered office in Milano in Via Sarfatti 25, hereby declares that it falls within the field of application of General Data Protection Regulation dealing with the protection of personal data (hereinafter referred to as the "Law"), with reference to use of the data subject's personal data (hereinafter referred to as "Data") also includes data regarded as "sensitive" (in the broadest sense of the term provided by the Law) namely information related to health, membership of student political groups, information related to racial or ethnic origin, handicapped family members, etc., provided by the data subject or collected from scholastic or tertiary institutions attended by the data subject.

1. The types of information we collect

We may collect the following types of personal data about you:

- Your name and contact information such as address, email address and telephone number, as well as your date of birth, national insurance number (or other tax identification number) and your passport number or national identity card details, country of domicile and your nationality, your image (picture and/or video).
- Information related to your education and employment history and your professional profile. We will also keep records on your interaction with the University and your preferences;
- Data related to your geographical position limited to the University buildings and urban campus;

2. Modality of the Treatment

The personal data is processed either in paper or electronic format. In the latter case, automatic instruments will be used. The data will be kept strictly for the time and scope for which they were collected. Specific security measures are adopted for preventing data breaches, illicit or non-correct uses and non-authorized access.

3. Purposes and Processing Data

Your image and information connected with the University and produced by Bocconi University during the performance of its institutional tasks, shall be subject to processing, including by electronic or automated means. Please note that this privacy policy shall apply as long as you do not enter in another relationship with the University. Data will be processed for the following purposes:

- a) For providing you with information related to similar services to those requested from the university, institutional communications and retargeting purposes;
- b) to respond to your particular queries and the usage of requested services;
- c) for security and internal organization purposes;
- d) data collected may be used for research and statistical purposes. These data can be processed both on not anonymous and aggregate basis and on an anonymous and aggregate basis;
- e) with your consent, for the circulation of periodical publications namely Bocconi News including fundraising and events to support Bocconi University activities in any manner, and in both printed and electronic format to the email address you provide to us; other editorial/digital/paper activities for communication/promotion purposes of the University requiring the use of images carried out on campus;
- f) for the library purposes, in order to grant the access to, among others, the facilities and materials therein, to borrow books and other products from the library, its consultation and, more in general, to benefit from all the services offered by the library;
- g) to meet logistic needs, we might process geo-localization data, to ensure more efficiency and to ensure safety;
- h) the University may pass some of your data to other organizations if it is necessary for the detection or prevention of crime or if it is required by law.
- i) with your consent, for the handling of activities correlated to commercial communications related to Bocconi University merchandising products, such as sending advertising material through the post, email, phone, SMS, MMS or similar means.
- j) To send electronic communications, based on the Data Controller's legitimate interest, to the email address you already provided, regarding similar products to those in which you have already shown interest.

l) to receive and manage orders, provide the products and services made available on the Data Controller's platforms, as well as processing and completing the payments made.

4. Circulation and Communication of Data

Data may be accessed by employees of Bocconi University, faculty and those required by law or for carrying out your activity with the University, that have the need in order to perform duties, as well as other entities providing services to Bocconi University, who the University has specifically nominated as responsible or qualified for the processing of the data of such subjects, in relation to their duties, shall have access to the pertinent data. The access of data is always linked to the purposes pointed out previously.

In addition, the data subject's data may be communicated to:

- a) Public entities both national and international such as ministries and public administration offices, in relation to the performance of the institutional tasks of the University.
- b) To natural persons or legal entities, external bodies and associations, including public, professional studios and companies (also outside of the republic of Italy) under the scope of the contract with the data subject and legitimate Bocconi University's interests. Said data may also be communicated to other legal entities (Bocconi Alumni Association, Istituto Javotte Bocconi, ISU Bocconi).

5. Granting of Data

The following Data will not be subject to your consent: Data processed for security and internal organization purposes; Data for the usage of available academic goods and services; Data processing institutional tasks of the University as well as the performance of activities and communications related to products and services where the individual has shown particular interest; and Data processing for the compliance of legal obligations. Data that is being processed upon your consent might not be needed necessarily but will be significant for us in order to provide some services for your interest.

Data you provide will be located in servers located in the European Economic Area.

6. The basis for processing your information and how we use it

We may process your personal data because it is necessary for responding to a particular request from you, legitimate interests, because there is a legal obligation or because you have expressed consent. In this respect, we use your personal data for the following:

- to interact with you punctually when you do not have a durable and stable relationship with the University;
- to deal with any concerns or feedback you may have;
- for any other purpose for which you provide us with your personal data.

We may also process your personal data because it is necessary for the performance of our tasks carried out in the public interest or because it is necessary for us or a third party's legitimate interests.

We may also process your personal data where:

- it is necessary to protect your or another person's vital interests; or
- we have your specific or, where necessary, explicit consent to do so.

7. International data transfers

Your personal data will not be transferred nor stored at a destination outside the European Economic Area ("EEA").

8. Data Subject's Rights

Data subjects have the following rights:

- to require us to correct the personal data we hold about you if it is incorrect;
- to require us to erase your personal data;
- to require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent without affecting the lawfulness of our processing based on consent before its withdrawal);
- to receive from us the personal data we hold about you which you have provided to us in a reasonable format specified by you including the purpose of your transmittal to another data controller;
- to object, on grounds related to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute and we may be entitled to refuse requests where exceptions apply.

If you have given your consent and you wish to withdraw it, please contact the responsible of the relevant department using the contact details set out below. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

9. Contact us

If you have any queries about this privacy notice or how we process your personal data, you can contact our Data Protection Officer at the following e-mail address: dpo@unibocconi.it

Bocconi University is the Data controller for the purposes of the personal data processed under this policy.