

Staff Privacy Policy

General Data Protection Regulation n. 679/2016 (hereinafter referred to as the "Regulation" or "GDPR"), with reference to use of the data subject's personal data (hereinafter referred to as "Data") provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

This Privacy Policy covers the information collected by European School of Economics including also data regarded as "sensitive" (in the broadest sense of the term provided by the Law) namely information relating to health, membership of political groups, information related to racial or ethnic origin, handicapped family members, etc., provided by the data subject. European School of Economics, ESE, we and us refer to European School of Economics Italy LTD as Controller and any of our corporate affiliates that may have been appointed as Processors.

Types of information we collect

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

- your name, contact information such as address, email address and telephone number, as well as your date of birth, tax identification number and your passport number or national identity card details, country of domicile, nationality, as well as your bank data. We may also allocate to you a unique identification number;
- information related to your academic and professional record. We will also keep records
 related to assessments of your work and other details regarding your professional record.
 In this sense we will keep the records of the evaluation of your work performance, including
 teaching evaluation, research impact index and other evaluations academic performance
 elements;
- information about your personal circumstances, and both academic and extracurricular interests, for example where this is relevant for the assessment of your suitability in the most favorable workplace and in order to connect you with other relevant colleagues and stakeholders;
- Data related to your geographical position limited to the ESE buildings and campus;
- sensitive personal data: information related to health, including disease and maternity, political opinions, membership of unions and political groups, etc., shall only be processed for the purposes allowed for by the Law and only for tasks of ESE;
- Contact Information you input in open text fields in help/contact us forms of our websites
- Information passively collected during your visit to our websites that may include navigational data (like log files, cookies and other clickstream data - you can find more information about cookies reading our cookie policy) and device information (like IP

address, hardware model, operating system version, unique device identifiers, and mobile network information).

Modality of the Treatment

The personal data are 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 accesses.

Purposes and Processing Data

Your image and information connected with ESE and produced by ESE during the performance of its institutional tasks shall be subject to processing, including by electronic or automated means. Data will be processed for the following purposes:

- The establishment and development of the labour relationship, as including all processing related to obtain all the activities carried out by internal workers, advisors and external collaborators and professors of different categories. Data will be processed for the activities necessary to fully provide and accomplish the terms agreed in the labour contract. This shall include planning and controlling of travel costs or verification and control of electronical access; definition of individual development plans; assessment of the services; statistics of presences and absences; management of medical certifications and other documents justify absences; verification of the usage of the telephone in order to attribute related costs and, more in general, for the management of the programme reserved to internal staff and collaborators of ESE;
- the performance of institutional tasks of ESE as well as the performance of activities and communications related to products and services of ESE and related video shots, tasks and obligations connected with the regulations of ESE and as indicated on the Internet. This will also include sending multimedia aids, circulation of periodical publications;
- for the circulation of periodical publications including events to support ESE 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 ESE requiring the use of images carried out on campus;
- to meet logistic needs, we might process geo-localization data, to ensure more efficiency and to ensure safety;
- for security and internal organization purposes, including the allocation of the ID card or other mechanisms in order to gain access to ESE services. Moreover, on the same grounds, Data collected may be used for research and statistical purposes. Data processing for internal organization purposes may include the carrying out of statistical assessments regarding work performance, guidance and actualization of profiles and competences and economic planning;
- for security and internal organization, verification and control of the informatic accesses; management of the telephone line and of the correspondence, informatic and not, in order to protect the data security, including personal data; activation and deactivation of the electronic badges and password; access regulation to archives and data base; furthermore,

- for the regulation, verification and control of the accesses to the ESE facilities as well as the usage of video surveillance;
- for the compliance with contractual and legal obligations. Note also that ESE may pass some of your data to other organizations if necessary for the detection or prevention of crime or if it is required by law.

Sharing of Personal Data

The Staff and Professors of ESE will have access to the information that concern them for the execution of their work task or in the capacity of the position they hold. Data may also be accessed by employees of ESE and those required by Law or for carrying out of the university career, that have the need in order to perform duties, as well as other entities providing services to ESE, who ESE 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:

- Both international and domestic public entities such as Ministries and Public Administration
 Offices, in relation to the performance of the institutional tasks of ESE including those
 related to procedures for issuing the permit to stay;
- Banking corporation under the scope of the contract with the data subject;
- natural persons or legal entities, external bodies and associations, including public, professional studios and companies (also outside of the Republic of Italy), for the scope of the contract with the data subject and legitimate ESE interests;
- close relatives in the case where it could be necessary to inform them and provide them with urgent communications;
- international entities, in relation to the participation in international programs when the destination Country complies with the adequacy principle.

Granting of Data

The following Data processing will not be subject to your consent: Data processed for security and internal organization purposes; Data for the establishment and development of the labour relationship; Data processing institutional tasks of ESE as well as the performance of activities and communications related to products and services that objectively might be of the professional's interest; 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.

The basis for processing your information and how we use it

We may process your personal data because:

- it is necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a labour contract, either temporary or permanent;
- it is necessary for the performance of our tasks carried out in the public interest as an academic institution;
- it is necessary for our or a third party's legitimate interests, including security and internal organisation measures and institutional communications;

- your consent has been given, including periodical publications;
- it is necessary to comply with a legal obligation

International Data Transfers

Some of the personal data we process about you will be transferred to and stored at a destination outside the European Economic Area ("EEA"), for example where it is processed by staff operating outside the EEA who work for us or for one of our suppliers or our partner, or where personal data is processed by one of our suppliers which are based outside the EEA or who use storage facilities outside of the EEA.

In these circumstances, your personal data will only be transferred on one of the following bases:

- where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. standard data protection clauses adopted by the European Commission);
- a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection; or
- there is another situation where the transfer is permitted under applicable law (e.g. where we have your explicit consent).

Data Subject's Rights

Data subjects have the following rights:

- to require correcting the personal data we hold about you if it is incorrect;
- to require erasing your personal data;
- to require restricting 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 for the purpose of you transmitting that personal data 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 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.

Contact us

If you have any queries about this privacy notice or how we process your personal data, you can contact us at the following e-mail address: privacy@uniese.it