

# **Students 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, or data relating to the companies in which you work;
- information related to your academic and professional record. We will also keep records about to assessments of your work, details of examinations taken, your predicted and actual examination grades and other information in your student record;
- information about your family or personal circumstances, and both academic and extracurricular interests, for example in order to provide you with appropriate care linked with your needs;
- data related to your geographical position limited to the ESE buildings and campus;
- data necessary for registration to the initiatives promoted by ESE, to the attendance at related events and to benefit of all the services provided through these initiatives;
- 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**

The personal data will be processed for the following purposes:

- for the supply of goods and services, for university orientation, to access the use of available academic resources and services. This purpose shall be understood as including all relevant processing activities necessary to provide educational services. Relevant processing activities will be the selection and admission procedure, enrolment and career, use of e-learning platforms, online presences detection, communication among students, communication between teachers and students or between university staff and students, graduation, thesis publication, accommodation, restaurant and the inclusion in the alumni community;
- for the management of academic and training initiatives with ESE's partner companies, including job placement activities, internships and any other related educational activity;
- for the provision of research services, including research activities and training products;
- to support ESE activities;
- under your consent, 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 provided to us; other editorial/digital/paper activities for communication/promotion purposes of ESE requiring the use of images carried out on Campus
- for security and internal organization purposes. Moreover, on the same grounds, Data collected may be used for research and statistical purposes on an anonymous and aggregate basis;
- to subscribe to ESE initiatives, to participate in the related events and to benefit of all the services provided by these initiatives;
- to meet logistic needs, we might process geo-localization data, to ensure more efficiency and to ensure safety;
- for the compliance with 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 required by law.

#### **Sharing of Personal Data**

Data may be accessed by students enrolled in similar courses and activities through the e-learning platform, Staff of ESE, faculty of the courses you attend and those required by Law or those in charge of administrative aspects and dealing with academic services, that have the need in order to perform duties or given their position held, as well as other entities providing services to ESE, whom 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. All this, always in connection with 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 will not be subject to your consent: Data processed for security and internal organization purposes; Data for the fruition of requested and subscribed academic goods and services; Data processing institutional tasks of ESE as well as the performance of activities and communications related to products and services for which the individual has shown particular interest; Data processing for the compliance of legal obligations. Data that are 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 ("EEA").

# 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 contract with ESE;
- it is necessary to supply or receive the goods and services contained in the contract, as well as other auxiliary activities;
- 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