



Occasional Contacts 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 education and employment history and your professional profile. We will also keep records on your interaction with the ESE and your preferences;
- Data related to your geographical position limited to the ESE buildings and urban campus;
- 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. Please note that this privacy policy shall apply as long as you do not enter in another relationship with ESE.

Data will be processed for the following purposes:

- to respond to your particular queries and the usage of requested services;
- for providing you with information related to similar services to those requested from ESE, institutional communications and retargeting purposes;
- 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 newsletter and 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 informatics accesses; management of the telephone line and of the correspondence, informatics 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;
- Data collected used for research and statistical purposes, can be processed both on not anonymous and aggregate basis and on an anonymous and aggregate basis;
- 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

Data may be accessed by employees of ESE, professors and those required by law or collaborate with ESE, 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;
- 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;

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 responding to a particular request from you, to interact with you punctually when you do not have a durable and stable relationship with ESE, to deal with any concerns or feedback you may have;
- 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").

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