

# INFORMATION UNDER ARTICLE 13 OF EU REGULATIONS 2016/679 ON PERSONAL DATA PROTECTION PROVIDED BY UNICAMILLUS UNIVERSITY

Under Article 13 of EU Regulations 2016/679 on the "protection of individuals concerning the processing of personal data" (hereinafter also "GDPR"), the Saint Camillus International University of Health and Medical Sciences – UniCamillus (hereinafter also "the University" or "UniCamillus"), with registered office in Via di Sant'Alessandro 8, 00131 - Rome provides the requested information on the processing of personal data concerning your person ("Data"), as follows:

### Identity and contact details of the data Controller

Under art. 4 of the GDPR, the data Controller is the Saint Camillus International University of Health and Medical Sciences – UniCamillus, with registered office in Via di Sant'Alessandro 8, 00131 – Rome.

### **Data Protection Officer (DPO)**

The Controller designates a Data Protection Officer (DPO), who can always be contacted at the following e-mail address <a href="mailto:dpo@unicamillus.org">dpo@unicamillus.org</a> or by calling the number +39 06 40 06 40, or by writing to the Controller's headquarters, to the attention of the Data Protection Officer.

#### **Categories of Personal Data**

Among the Data that the University processes are:

- Common data: personal data, contact information, data on your education/training, data on income/financial situation;
- Special categories of personal data as stated in art. 9 of the GDPR (e.g. state of health data, disability, racial or ethnic origin).

We also inform you that, in the university premises, there is a CCTV system, appropriately signalled before its own range of action by means of the related Notice information plaques, as under the Video Surveillance Decision issued by the Italian Data Protection Authority (the "Garante" below) on April 8th, 2010 ("Video Surveillance Decision"). Therefore, the Data also include your image displayed and/or recorded via CCTV systems.

# Purpose of the processing and legal basis

The data you provide will be processed for the following purposes:

- a) Registration for the admission test/calls for application; enrolment in other activities promoted by UniCamillus; implementation of the enrolment procedure and other requirements related to the position of the student/user of various initiatives; execution of the institutional functions of the University, as well as the use of other services (e.g. scholarships and grants, cultural activities and sports events organised by the University, etc.); post-graduate training activities promoted by the University and consistent with your study plan; extra-curricular internship services and job placement services;
- b) Sending administrative and informative communications relating to your participation in courses, seminars, orientation activities (e.g. Open Day, Career Day) in which you have enrolled, organised directly by the University and/or in collaboration with it; and disbursement of scholarships requested by you;
- c) Response to requests for information you made to the University;
- d) Carrying out administrative, accounting, fiscal and patrimonial activities related to the management of your relationship with the University;
- e) Subject to your prior specific consent, sending promotional communications and informative material with automated and non-automated contact procedures, concerning: registration to events and other initiatives organised by UniCamillus or its partners and/or third parties, opinion surveys, satisfaction surveys, statistics and/or research initiatives:
- f) Release and management of identification tools at the disposal of students and/or users in order to guarantee the control



- of physical access to classrooms, laboratories and University premises in general; access to services at the disposal of students:
- g) Company assets safety and protection purposes;
- h) Management of claims and controversies; prevention/suppression of frauds or any illegal activity;
- i) Subject to your prior specific consent, communication, publication, circulation as well as storage in IT or paper archives of images and videos of students during tutoring. This material can be recorded in order to produce videos and multimedia products to be used as advertising, informative and publicity tools about the University activities. Images and multimedia products can be published, freely allowed, on institutional websites, social networks and on any other broadcast mean (booklets, brochures, magazines, newspapers, exhibitions, etc.);
- j) Subject to your prior consent, communication to independent third parties interested in cognitive activities aimed at possible postgraduate employment proposals.

The legal basis of the processing consists of:

- 1. For the purposes mentioned in sub a), b), c) and f):
  - With reference to the Common Data, the execution of the contract of which you are part or the execution of precontractual measures, such as participation in the admission test;
  - With reference to special categories of personal data the need to fulfill the obligations and exercise your rights with regard to social protection, for purposes connected to the performance of teaching support activities, for the use of economic benefits or additional services linked to the performance of the University's institutional activities.
- 2. For the purposes mentioned in sub d), the fulfilment of legal obligations to which the Controller is subject;
- 3. For the purposes mentioned in sub e), i) and j), the consent given by you. Consent to the provision of data for filming or photography may be expressed by completing this form or by the voluntary act of the person concerned to remain present at the time when photographs/videos/recordings, etc. are taken.
- 4. For the purposes mentioned in sub g) and h), the legitimate interest of the Controller.

The provision of your data for the purposes referred to under sub a), b), c) d) and f) is mandatory by contract. Any refusal to provide your data will result in the inability to proceed with your enrolment at the University; to perform administrative activities related to the position of student/user of education initiatives; to follow up on your requests and/or to allow you to participate in courses, seminars, activities and events organised by the University. Similarly, for the purposes under sub g) and h) provision of your data is necessary due to the legitimate interest of the Controller. Your refusal to consent to the processing for the purposes mentioned in sub e), i) and j) will not allow the University to pursue only the purposes indicated therein.

### **Processing methodologies**

The processing of personal data is performed, in a lawful, correct and transparent manner and in compliance with the principle of minimization, through manual and telematic tools, and is aimed exclusively at fulfilling the obligations deriving from the individual contractor from legal regulations, and in a way which guarantees the safety and confidentiality of the data in accordance with applicable rules. Personal data will be processed directly by the Controller through employees, consultants and collaborators and/or similar personnel, specifically authorized to the processing of personal data under art. 29 GDPR. Class attendance is also recorded by means of electronic timecard stamping and the related data are managed directly by the University Representative. Your data may also be processed by external collaborators of the Controller, designated as Data Protection Officers under art. 28 GDPR.

## Data storage period

The University will use the data for the time strictly necessary to the pursuit of the abovementioned purposes, except for the storage periods provided by the law or regulations. Personal data relating to your university career cannot be deleted and will be retained indefinitely in accordance with the archiving obligations imposed by current legislation. Data collected on the basis of your consent will be retained until your consent is revoked. Only the images detected by the CCTV system are instead stored for 24 hours after recording.

### Categories of individuals to whom data may be communicated

Your data may be communicated to external Companies/Entities, in order to comply with legal obligations or internal regulations



of the University and/or to allow the execution/provision of the service requested by you and, in particular, to:

- Public and private Entities or competent Authorities;
- Banking Institutions;
- Entities and Institutions:
- Entities and various organisations for purposes related to the performance of the University's institutional activities (e.g. supplementary educational activities, internship, orientation and placement activities, cultural promotion and scientific and tutoring information);
- External Companies/Entities for supporting the University in sending communications and informative material, also concerning promotional activities, as well as market surveys;
- Companies that operate in the substitutive archive services sector.

Said subjects operate, according to reason, as autonomous data controllers or data processors appointed pursuant to Article 28 GDPR of the processing operations entrusted to them by the University. The updated list of data processors can be requested by contacting the Data Protection Officer at the addresses indicated in this notice.

#### Personal data transfer

Your personal data will be processed within the European Union and stored on servers located within the European Union. Should the transfer of data outside the European Union become necessary, the Controller ensures from now on that the transfer of data outside the EU will take place in compliance with applicable provisions, for example, after the stipulation of standard contractual clauses and in accordance with the indications provided by the Garante.

### Rights of the data subject

Under articles 15 et seq. of EU Regulations 2016/769, as data subject, you have the following rights:

- **Right to access**: you have the right to request from the Controller confirmation as to whether or not personal data concerning you are being processed and, if so, to request access to the information specified in Article 15 of the GDPR;
- **Right to rectification**: you have the right to request from the Controller rectification of incorrect personal data without undue delay and the integration of incomplete personal data, also by providing a supplementary declaration;
- **Right to erasure**: you have the right to request from the Controller the erasure of personal data concerning you without undue delay, should the reasons specified in Article 17 of the GDPR exist;
- **Right to restriction of processing**: you have the right to request from the Controller the restriction of processing when one of the hypotheses as provided for in Article 18 of the GRPD apply;
- **Right to data portability**: you have the right to receive your personal data provided to the Controller in a structured, commonly used and machine-readable format. You also have the right to transfer such data to another Controller, without any hindrance from the Controller who was provided with your data, if the conditions provided for in Article 20 of the GDPR apply;
- **Right to object**: you have the right to object against the processing of your personal data at any time on grounds relating to your particular situation, in the cases and in the manner provided for in Article 21 of the GDPR;
- **Right to withdraw your consent at any time** under Article 7, Paragraph 3 of the GDPR, notwithstanding the lawfulness of data processing performed on the basis of subsequently withdrawn consent;
- Right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, in the manner provided for in Article 22 of the GDPR.

  The forementioned rights can be exercised by sending a request to UniCamillus at the above-mentioned address, or to the specially designated Data Protection Officer, who is available at the following e-mail address: dpo@unicamillus.org.

### Right to lodge a complaint to the Supervisory Authority

If you believe that the processing of your data is in violation of the provisions of the Regulations, you have the right to complain to the Garante for the protection of personal data (www.garanteprivacy.it), as provided for in Article 77 of the Regulations, or to take legal action (Article 79 of the Regulations).

declare that I have read the Notice regarding the processing of personal data	
	(Date and place



		(Student's signature)
CONSENT TO THE PROCES	SING OF PERSONAL DAT	ΓΑ
communications and informative	e material with automated and issed by UniCamillus or its pa	rred to in paragraph 4 lett. e) of this notice (sending promotional d non-automated contact procedures, concerning: registration to artners and/or third parties, opinion surveys, satisfaction surveys,
[_] give my consent	[_] deny my consent	
		(Date and place)
		(Student's signature)
CONSENT TO THE PROCES	SING OF PERSONAL DAT	TA – PICTURES
publication, circulation as well a This material can be recorded in publicity tools about the Unive	s storage in IT or paper archi order to produce videos and ersity's activities. Images an	ferred to in paragraph 4 lett. i) of this notice (communication, ives of images and videos of students, during tutoring activities. multimedia products to be used as advertising, informative and and multimedia products can be published, freely allowed, on roadcast means (booklets, brochures, magazines, newspapers,
[ _ ] give my consent	[_] deny my consent	
		(Date and place)
		(Student's signature)
	CTORY ACTIVITIES AIM	AL DATA TO INDEPENDENT THIRD PARTIES ED AT POTENTIAL POST-GRADUATION
		erred to in paragraph 4 lett. j) of this notice (communication to ed at possible postgraduate employment proposals), I
[_] give my consent	[_] deny my consent	
		(Date and place)
		(Student's signature)