



## **INFORMATION IN COMPLIANCE WITH ARTICLE 13 OF REGULATIONS (EU) 2016/679 ON THE PROCESSING OF PERSONAL DATA PERFORMED BY UNICAMILLUS UNIVERSITY**

In compliance with Article 13 of Regulations (EU) 2016/679 on the "protection of individuals concerning the processing of personal data" (from now on also "*Gdpr*"), *Saint Camillus International University of Health and Medical Sciences - UniCamillus*, with registered office in Via di Sant'Alessandro 8, 00131 – Rome and in its capacity as data controller, (from now on also "Data Controller" or "University"), provides the requested information on the processing of Your personal data ("Data") as it follows:

### **1) Identity and contact details of the data controller**

In compliance with Article 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.

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

The data controller designates a Data Protection Officer ("DPO"), who can always be contacted at [rdp@unicamillus.org](mailto:rdp@unicamillus.org) or by calling +39 06 40 06 40, or by writing a communication addressed to the data controller's office and the Data Protection Officer.

### **3) Categories of Personal Data**

Among the Data that the University treats are:

- Common data: Personal data, Contact information, data related to your education, data showing the income/financial situation; - Particular categories of personal data as stated in Article 9 of the GDPR (e.g. state of health information, disability, racial or ethnic origin).

We also inform You that, in the university building, there is a closed-circuit video surveillance system, appropriately signaled before its own range of action by means of the application of information plaques, as under the General Video Surveillance Provision issued by the Data Protection Authority for the protection of personal data ("Authority") on April 8th, 2010 ("Video Surveillance Measures"). Therefore, the Data also includes Your image displayed and/or recorded via closed circuit video surveillance systems.

### **4) Purpose of the processing and legal basis**

The data provided by You 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 process and other requirements related to the position of the student/user of the various initiatives, execution of the institutional functions of the University, as well as the use of performances or other services (e.g. scholarships and grants, cultural activities and sport events organised by the University, etc.), as well as post-graduation education activities promoted by the University and coherent with Your study plan, and for extra-curricular internship services and job placement services;
- b) Sending communications and informative material regarding Your participation and registration to courses, seminars, orientation activities (e.g. Open Day, Career Day) to which you registered, organised directly by the University and/or in collaboration with it, as well as granting of scholarships requested by You;
- c) Response to requests for information sent by You to the University;
- d) Carrying out administrative, accounting, tax, and asset management activities related to 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 promoted by UniCamillus, namely organised by UniCamillus partners and/or third parties, cognitive surveys, satisfaction surveys, statistical 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 and 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, disclosure as well as storage in IT and/or paper archives of students' images and/or videos, during the conduct of their educational activities. 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, as well as social networks and on any other broadcast mean (booklets, brochures, periodicals, newspapers, exhibitions, etc.);

j) Subject to Your prior consent, communication to independent third parties interested in proposing housing solutions for University students;

k) Subject to Your prior consent, communication to independent third parties interested in cognitive activities aimed at any proposals for postgraduate employment.

The legal basis of the processing is:

1. For the purposes mentioned in sub a), b), c) and f):

- With reference to the Common Data, the execution of the contract You are part of or the execution of pre-contractual measures, such as participation in the admission test;
- With reference to particular categories of personal data, the need to fulfill the obligations and exercise Your rights with regards to social protection for purposes connected with the teaching support activities, 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 fulfilling of legal obligations to which the data controller is subject;

3. For the purposes mentioned in sub e), i), j) and k), the consent given by You. Consent for the collection of data for filming or photography can be given by completing this form or by the voluntary act of the individual to remain present when photographs/videos/recordings, etc. are being taken.

4. For the purposes mentioned in sub g) and h), the legitimate interest of the data controller.

The provision of consent to the processing of your data for the purposes referred to under sub a), b), c), d) and sub f) is must be deemed mandatory by contract, but any refusal to provide Your data will result in the inability to proceed with Your registration at the University, to perform administrative activities related to the position of student/education initiatives user, as well as 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 stated in sub-paragraphs g) and h), the provision of your data is necessary due to the legitimate interest of the Data Controller. On the contrary, it is understood that Your refusal to consent to the processing for the purposes mentioned in sub e), i), j) and sub k) will not allow the University to pursue only the purposes indicated therein.

## **5) Data 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, IT and telematic instruments, and is aimed exclusively at fulfilling obligations deriving from the individual contract, from the applicable collective contract, or from legal Regulations, and in any case, in a way which guarantees the safety and confidentiality of the data in accordance with the applicable rules. The personal data will be processed directly by the data controller through employees, consultants and collaborators and/or similar personnel, specifically authorised to the processing of personnel data in compliance with former Article of the 29 GDPR. The recording of attendance to lectures is also done through electronic stamping and the related data are managed directly by the University Representative. Your data may also be processed by data controller's external collaborators, designated as Data Protection Officers under Article 28 of the GDPR.

## **6) The data retention period**

The University will use the data for the time strictly necessary to the pursuit of the aforementioned purposes, except the eventual terms of retention provided by the law or Regulations. Personal data related to university career cannot be deleted and will be

stored indefinitely according to the archiving obligations imposed by current regulations. The data collected based on Your consent will be kept until you withdraw Your consent. Only images detected by the video surveillance circuits are instead saved for a period of time of 24 hours from the filming.

#### **7) 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 University Regulations and/or to allow the execution of the service/provision of the performance 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, professional guidance and placement activities, cultural promotion and scientific and teaching information);
- external companies/entities for supporting activities for 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.

These entities operate, based on the appropriate justification, as independent data controllers, that is to say as data processors appointed according to Article 28 of the GDPR for the processing tasks entrusted to them by the University. The updated list of data processors can be requested by contacting the Data Protection Officer at the contact details provided in this notice.

#### **8) Transfer of personal data outside**

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

#### **9) Rights of the interested party**

In compliance with Articles 15 et seq. of Regulations (EU) 2016/679, as the interested party, You have the right to:

- request to the data controller the confirmation as to whether or not personal data concerning You are being processed and, if so, to request the access to personal data and to the information specified in Article 15 of the GDPR;
- request to the data controller the modification of incorrect personal data concerning You without undue delay and the integration of incomplete personal data, also by providing a supplementary declaration;
- request to the data controller the deletion of personal data concerning You without undue delay, should the reasons specified in Article 17 of the GDPR exist;
- request from the data controller the limitation of the processing when one of the hypotheses as indicated in Article 18 of the GDPR apply;
- receive, in a structured, commonly used and machine-readable format by automatic device, the personal data concerning You and provided to the data controller. You also have the right to transfer such data to another data controller, without any hindrance from the data controller of the processing to which You have provided, if the conditions indicated in Article 20 of the GDPR apply;
- oppose at any time, for reasons related to Your particular situation, the processing of personal data concerning You in the cases and in the manner indicated in Article 21 of the GDPR;
- revoke consent at any time, in compliance with former Article 7, Paragraph 3 of the GDPR, notwithstanding the lawfulness of data processing performed on the basis of subsequently revoked consent;
- not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning You or which similarly and significantly affects Your person, in the manner indicated in Article 22 of the GDPR. The forementioned rights can be exercised by sending a request to the UniCamillus University at the above-mentioned address, or to the specially designated Data Protection Officer, who can always be contacted at [rpd@unicamillus.org](mailto:rpd@unicamillus.org).

#### **10) Right to lodge a complaint to the Authority**

Finally, 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 Authority for the protection of personal data ([www.garanteprivacy.it](http://www.garanteprivacy.it)), as indicated in Article 77 of the same Regulations, or to take legal action (Article 79 of the Regulations).

The constantly updated version of these Regulations will be available in the "Privacy" section of the UniCamillus institutional

website.

**I declare that I have read the Regulations regarding the processing of personal data**

\_\_\_\_\_ (Date and place)

\_\_\_\_\_ (Signature)

#### **CONSENT TO THE PROCESSING OF PERSONAL DATA FOR INFORMATIVE PURPOSES**

In relation to the processing of my data for the purposes referred to in paragraph 4 lett. e) of these Regulations (sending of promotional communications and informative material with automated and non-automated contact modalities, concerning: registration to events and other initiatives promoted by UniCamillus, namely organised by UniCamillus partners and/or third parties, cognitive surveys, satisfaction surveys, statistical and/or research initiatives,), I

**give my consent**       **deny my consent**

\_\_\_\_\_ (Date and place)

\_\_\_\_\_ (Signature)

#### **CONSENT TO THE PROCESSING OF PERSONAL DATA - IMAGES**

In relation to the processing of my data for the purposes referred to in paragraph 4 lett. i) of these Regulations (Communication, publication, disclosure as well as storage in IT and/or paper archives of students' images and/or videos, during the conduct of their educational activities. 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, as well as social networks and on any other broadcast mean - booklets, brochures, periodicals, newspapers, exhibitions, etc...), I

**give my consent**       **deny my consent**

\_\_\_\_\_ (Date and place)

\_\_\_\_\_ (Signature)

#### **CONSENT TO THE COMMUNICATION OF PERSONAL DATA TO INDEPENDENT THIRD PARTIES INTERESTED IN PROPOSING HOUSING SOLUTIONS FOR UNICAMILLUS STUDENTS**

In relation to the processing of my data for the purposes referred to in paragraph 4 lett. J) of these Regulations (communication to independent third parties interested in proposing housing solutions for University students), I

**give my consent**       **deny my consent**

\_\_\_\_\_ (Date and place)

\_\_\_\_\_ (Signature)

**CONSENT TO COMMUNICATION OF PERSONAL DATA TO INDEPENDENT THIRD PARTIES INTERESTED IN COGNITIVE ACTIVITIES AIMED AT ANY PROPOSING POSTGRADUATE EMPLOYMENT**

In relation to the processing of my data for the purposes referred to in paragraph 4 lett. k) of these Regulations (communication to independent third parties interested in cognitive activities aimed at any proposing postgraduate employment), I

[  ] give my consent [  ] deny my consent

\_\_\_\_\_ (Date and place)

\_\_\_\_\_ (Signature)