*Legend: the sections in italics and brackets are to be filled out based on the specific nature of the individual processes and requirements of the department/body in question.*

*The sections in red are a guide and must be deleted in the final document. MOD/2 - Information Form - (Attachment to DOC/3 - Information to be provided to the interested party) REV/1 – 31/05/2018*

*REV/2 – 08/06/2018*

*REV/3 – 09/07/2018*

*REV/4 – 10/01/2019*

*REV/5– 21/01/2019*

**INFORMATION ON THE PROCESSING OF DATA INHERENT TO PROCESSES**
*[indicate specific process, where possible]* + *[of Department X, Office X, etc.]*

Dear user, in accordance with Article 13 of EU Regulation 2016/679, also known as GDPR, please find the following information on how we will process your personal data.

Your personal data will be processed in accordance with the principles of propriety, lawfulness, transparency and the protection of privacy and your rights. It may occur manually or electronically or with the the use of IT or automated devices. Data processing may consist of any operation carried out with or without the use of automated processes, including the collection, recording, organisation, structuring, storage, elaboration, selection, blocking, adaptation, modification, extraction, consultation, use, communication via transmission, diffusion or any other means of making available, comparison, interconnection, limitation, cancellation or destruction of said data.

# Who is the Data Controller?

The Data Controller - i.e. the body that determines how and why your data is processed - is the University of Milano-Bicocca, located in Piazza dell’Ateneo Nuovo 1, 20126 Milan, represented by its legal representative Rector Maria Cristina Messa (hereinafter the “Controller”). You can contact the Controller by writing to the address shown above or sending an email to rettorato@unimib.it or the certified email address ateneo.bicocca@pec.unimib.it

# Who is the Data Protection Officer?

The University of Milano-Bicocca has appointed a Data Protection Officer who can be contacted with all queries relating to personal data processing and to exercise any rights deriving from GDPR. The Data Protection Officer is Ms Maria Bramanti, who can be contacted at rpd@unimib.it or certified email address rpd@pec.unimib.it

# Why do we process your data?

In accordance with Article 6, Paragraph 1 of GDPR, your personal data is processed so that the relevant university department/bodies can fulfil all duties allocated to them. More specifically, the university with process your data for:

* *[E.g.: recruitment and career management]*
* *[E.g.: activities relating to orientation]*
* *[E.g.: supply of library services]*
* *[E.g.: participation in procurement procedures for goods and services]*
* *[E.g.: profiling activities, provided consent is granted [[1]](#footnote-1)]*
* *[E.g.: use/diffusion of images[[2]](#footnote-2), provided a release form has been signed]*

# Who can we communicate your data to?

Your data is processed by personnel who belong to the departments of the university and are authorised by the Data Controller, in accordance with their functions and skills.

Moreover, the Data Controller can communicate your personal data to the following external third-party subjects, because their activities are essential to the achievement of the aforementioned purposes, including as regards functions attributed to them by law:

* *[E.g.: MIUR - Ministry of University and Research]*
* *[E.g.: Certification bodies as part of checks on statutory declarations made in accordance with Presidential Decree No. 445/2000]*
* *[E.g.: Other public or private figures to whom the university allocates services for which they have the required skills, within the limits set out by law, on at out-sourcing basis or as part of conventions or agreements];*
* *[E.g.: Judicial authorities, in order to identify and/or prevent crimes]*
* *[E.g.: Doctor, for medical examinations and health monitoring];*
* *[E.g.: CINECA education consortium].*

*[Ensure to specify whether or not data will be transferred out of the EU or to international organisations, choosing one of the following two options]*

In the event that your data is transferred out of the EU or to international organisations, you will be provided with a specific information notice. In the event that no decision on adequacy has been issued for the destination country, or if appropriate and adequate guarantees are not available as regards data protection and/or no information as to how to obtain a copy of your data or the location where the data is made available is provided, you will be asked to grant your consent before we proceed with the transfer. *[Phase for departments that may transfer data out of the EU or to international organisations]*

Your data will not be transferred to countries outside the EU or to international organisations. In the event that this becomes necessary, you will be provided with a specific information notice. In the event that no decision on adequacy has been issued for the destination country, or if adequate guarantees are not available as regards data protection, you will be asked to grant your consent before we proceed with the transfer. *[Phase for departments which, as a rule, do not transfer data out of the EU]*

*[****NB****: in the event that data is transferred to non-EU areas or bodies, the following rules must be respected: the information notice must clearly inform the interested party whether or not the EU Commission has issued a decision on adequacy (i.e. whether or not the Commission has decided that the country or international organisation in question guarantees an adequate level of personal data protection - the Commission’s decisions on adequacy can be consulted at the following links:* [*https://www.garanteprivacy.it/home/provvedimenti-normativa/normativa/normativa-comunitaria-e-*](https://www.garanteprivacy.it/home/provvedimenti-normativa/normativa/normativa-comunitaria-e-intenazionale/trasferimento-dei-dati-verso-paesi-terzi)[*intenazionale/trasferimento-dei-dati-verso-paesi-terzi*](https://www.garanteprivacy.it/home/provvedimenti-normativa/normativa/normativa-comunitaria-e-intenazionale/trasferimento-dei-dati-verso-paesi-terzi)*) If a decision on adequacy has been issued, no specific authorisation is required. In the event that it is necessary to transfer data to countries for whom a decision on adequacy has not been issued, the information notice must explicitly confirm the present of appropriate or adequate guarantees in the destination country and/or information as to how to obtain a copy of your data or the location where the data is made available. In the event that no adequate guarantees can be supplied, the interested party must be asked to grant their consent for data transfer].*

# Is it compulsory for you to provide us with your data?

Yes, because if you fail to do so, the university will be unable to complete required activities and deal with requests. However, no formal declaration of consent for data processing is required.

The data of children or persons who are unable to express their consent will only be used provided consent is provided by the parent/s or the person with parental/legal responsibility. *[Phrase ONLY to be used for departments/bodies who process the data of children]*

*[Consent is not required for institutional activities, legal obligations, execution of contract, adoption of security measures. Consent is required for secondary marketing purposes and profiling.]*

# How long will we store your data for?

If your personal data is stored in the database of the Data Controller, it is stored for an unlimited period of time. If your personal data is contained in analogue documents and/or digital products or products owned by the Data Controller, this data is subject to legal storage time limits; the various time limits are contained in the “Disposal of analogue and digital documents guidelines”, which can be found on the university website.

Where present, authentication logs will be erased after 180 days.

# What are your rights and how can you exercise them?

You have the right to:

* access your personal data;
* obtain the correction or cancellation of data or the limitation of data processing;
* request data portability if data is in digital form;
* oppose data processing;
* make a complaint to the supervisory authorities.

You can exercise your rights by contacting the Data Controller and/or the Data Protection Officer; the Data Controller must respond to your within 30 days of the date they receive your request (this period can be extended to 90 days if the request is particularly complex).

In the event that you believe that your data has been processed in a way that violates relevant regulations, or if the response to a request in which you have exercised one or more of the rights set out in Articles 15-22 of GDPR fails to arrive within the time limit indicated or is unsatisfactory, you can contact the supervisory authority or the authority of the protection of personal data.

# Will you be subject to automated decision-making processes?

*[Specify whether or not the Data Controller uses automated decision-making processes for data processing. Automated decision-making processes are processes that are based on the data supplied directly by the interested person (e.g. through a questionnaire) or by the observation of people (e.g. location data gathered through an app)]*

No, you will not be subject to any decisions based solely on automated processes (including profiling), unless you have explicitly provided your consent for this.

# Is your data safe?

Your data is processed in a lawful, proper manner and we adopt appropriate security measures designed to prevent any unauthorised access, disclosure, modification or destruction of the data.

*[This policy was last updated on xx/xx/2019]* [*Insert most recent date on which the policy was updated]*

**CONSENT FOR DATA PROCESSING** *[delete this part if consent not required]*

I, the undersigned, Mr/Ms

surname name

Italian tax code

residing in

am aware of my rights and have read this policy

- and recognise that I can withdraw my consent at any time, without prejudice to the lawfulness of data processing carried out on consent provided before this withdrawal -

authorise

the Data Controller to process my data in electronic and paper form for the above purposes.

**CONSENT FOR DATA PROCESSING FOR CHILDREN UNDER THE AGE OF 16** *[delete this part if consent not required]*

We, the

parents/guardians of the child born on

having received the information provided by the Data Controller in accordance with Article 13 of EU Regulation 2016/679, declare that we are in full possession of the right of parental/legal responsibility for the child in question, and hereby authorise the collection and processing of data necessary for *[clearly specify data processing purposes].*

Date / /

Signatures

In accordance with Article 316, Paragraph 1, Article 337 ter, Paragraph 3, and Article 337 quater of the Italian Civil Code, in the event that the consent form is signed by one parent only, the consent of both parents will be presumed.

1. *Article 4 of GDPR defines profiling as "any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.”* [↑](#footnote-ref-1)
2. In accordance with the law on copyright (No.633/1941), no authorisation is required to collect images or audio-visual content, but authorisation is required in order to use/diffuse these images, except where the reproduction of the images is justified by the profile of the subject or the public office they hold, by legal or police requirements, for scientific, educational or cultural reasons or where reproduction is linked to facts, events or ceremonies in the public interest or held in public. [↑](#footnote-ref-2)