



ENROLLMENT PRIVACY POLICY

Privacy policy for the processing of personal data collected and processed for the University enrollment process

Information notice in accordance with art. 13 EU Reg. 2016/679

In compliance with EU Regulation 2016/679, General Data Protection Regulation ("GDPR") as amended, we provide data subjects with due information regarding the processing of personal data. This information is given pursuant to Articles 13 of EU Reg. 2016/679.

DATA CONTROLLER, in accordance with Articles 4 and 24 of EU Reg. 2016/679, is LUMSA Libera Università Maria Ss. Assunta, based in Via della Traspontina, 21 - Rome, in the person of the special attorney. Data controller's contact information: privacy@lumsa.it

Preliminarily, it is hereby represented that all the activities carried out by the data controller as a university (regardless of the specific nature and legal form assumed¹), are embedded in the achievement of public interest purpose (cf. art. 1, paragraph 1 of Law no. 240 of 2010, referring to both state and non-state universities), a purpose that consists in the promotion of study and culture in general, through free teaching (cf. Art. 33 Const. and 1 of the above-mentioned Law No. 240 of December 30, 2010), education and training in school, professional, high school or university areas.

That said, the processing of personal data shown in the following tables, as well as the related purposes pursued, fall under "the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller" (Art. 6(1)(e) and, with regard to special categories of data, Art. 9(g) of EU Reg. 2016/679).

DATA PROTECTION OFFICER (DPO)

The University has also appointed a Data Protection Officer ("DPO") pursuant to Articles 37 - 39 of EU Reg. 2016/679, whose contact details are as follows: email dpo.lumsa@dpoprofessionalservice.it

TYPE OF DATA PROCESSED

Definitions:

- **'personal data'** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person; art. 4, p. 1 GDPR.
- **'categories of special data'** personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, [...] genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation; art. 9, p. 1 GDPR.
- **'personal data relating to criminal convictions and offences or related security measures'**; art. 10 GDPR.

Data subjects are informed, in accordance with EU Regulation 2016/679, that the personal data acquired by the Data Controller in compliance with the legislative and contractual provisions in force will be processed, in accordance with the aforementioned legislation and confidentiality obligations.

Processing of personal data means: "any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction".

¹ See Prov. No. 317, Sept. 16, 2021 - Injunction Order against Università Commerciale "Luigi Bocconi" in Milan [9703988] of the Italian Data Protection Authority - <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/9703988>;

See Council of State, Advisory Section for Regulatory Acts, Section Meeting of May 9, 2019, No. 1433/2019, which follows Advisory Section for Regulatory Acts, Section Meeting of January 31, 2019, No. 370/2019.



Data subject means an “identified or identifiable natural person” i.e. the students who enroll at the University.

	Purpose of processing	Legal basis of processing	Data retention period	Nature of provision and refusal
A)	<p>Enrollment in degree programs and management of the study path.</p> <p>This purpose includes:</p> <ul style="list-style-type: none"> - the processing of the income-based contribution bracket, calculation of the amount of fees due; - the management of the University career of the data subjects and related activities (management of the study plan, enrollment and attendance of university courses, enrollment in specific calls, possible attendance tracking, exam registration, sending communications related to one’s university career). 	<p>Art. 6, par. 1, letter e), 3, letter b) and 9, par. 2, letter g) of the GDPR and Arts. 2-ter and 2-sexies of the Privacy Code (D.Lgs 196/2003 as amended by D.Lgs 101/2018); performance of a task carried out in the public interest in the field of university education and training.</p>	<p>Art. 1 Ministerial Decree May 30, 2001 (G.U. 175, July 30, 2001) “Identification of essential data on student careers.</p>	<p>The provision of data is necessary in order to perform a task of public interest for the University.</p> <p>Failure to provide personal data will prevent the University from completing the applicant's enrolment and carrying out all the activities related and functional to enrolment.</p>
B)	<p>Fulfillments required by law.</p> <p>This purpose includes:</p> <ul style="list-style-type: none"> - fulfillments required for the purpose of managing the educational and administrative relationship between the LUMSA University and students. 	<p>Art. 6 par. 1, letter c) GDPR. legal obligations.</p>	<p>Art. 1 Ministerial Decree May 30, 2001 (G.U. 175, July 30, 2001) “Identification of essential data on student careers.”</p>	<p>The provision of data is mandatory.</p> <p>In case of non provision, it will be impossible for the data controller to fulfill legal obligations.</p>
C)	<p>Measures for the right to university study, such as the granting of financial benefits, scholarships, limits and exemptions on tuition fees, and/or any other benefits provided by law.</p> <p>This purpose includes:</p> <ul style="list-style-type: none"> - the handling of paperwork related to applications for tuition fee waivers; - the acquisition of any existing employment contracts, information regarding specific hardship situations (e.g., students who are parents), family caregiver situations, territorial 	<p>Art. 6 par. 1 letter c) GDPR - legal obligation.</p> <p>Arts. 3 and 34 of the Italian Constitution.</p> <p>Art. 5 of Law 240/2010 (Delegation on interventions for the quality and efficiency of the university system) and D.lgs 68/2012 of implementation (“Revision of the principle regulations on the right to study and enhancement of legally recognized university colleges, in implementation of the delegation provided for by Article 5, paragraph 1,</p>	<p>Art. 1 Ministerial Decree May 30, 2001 (G.U. 175, July 30, 2001) “Identification of essential data on student careers.”</p>	<p>The provision of data is mandatory to allow the University to fulfil legal obligations and to guarantee the right to study for the data subjects.</p> <p>In case of non provision of the data, the granting of benefits will be compromised.</p>



	<p>differences related to the cost of maintaining studies (for on-campus, commuter, or off-campus students), etc.;</p> <ul style="list-style-type: none"> - the provision of housing and residence services for university students. 	<p>letters a), second period, and d), of Law 240 of December 30, 2010, and according to the principles and guidelines established in paragraph 3, letter f), and paragraph 6”).</p>		
D)	<p><i>Ensuring the right to education.</i></p> <p>This purpose includes:</p> <ul style="list-style-type: none"> - pursuing the objectives outlined in Article 2 of Law 170/2010, concerning individuals with Specific Learning Disorders/Disabilities (SLD): <i>a) ensuring the right to education;</i> <i>b) promoting academic success, including through supportive teaching measures, ensuring adequate training, and fostering the development of potential;</i> <i>c) reducing relational and emotional discomfort;</i> <i>d) adopting forms of assessment and evaluation appropriate to the educational needs of students;</i> <i>e) preparing teachers and raising parents’ awareness of issues related to SLD;</i> <i>f) promoting early diagnosis and rehabilitative educational pathways;</i> <i>g) increasing communication and collaboration between family, school, and health services during the education and training process;</i> <i>h) ensuring equal opportunities for the development of abilities in social and professional contexts.</i> - providing aids, supports, and additional time for exams for individuals with SLD. 	<p>Art. 2 of Law October 8, 2010, No. 170, New regulations on specific learning disabilities in the school environment.</p> <p>Art. 20 of Law February 5, 1992, No. 104, Framework law for assistance, social integration, and the rights of disabled persons.</p> <p>Art. 16 of Law 68/1999 (Regulations for the right to work of disabled persons).</p> <p>Art. 9 par. 2 letter g) GDPR - “processing necessary for reasons of substantial public interest [...]”.</p> <p>Art. 2-sexies par. 2 letter bb) of the Privacy Code (D.Lgs 196/2003 as amended by D.Lgs 101/2018) substantial public interest in the field of education and training in school, professional, higher, or university environments.</p>	<p>Art. 1 Ministerial Decree May 30, 2001 (G.U. 175, July 30, 2001) “Identification of essential data on student careers.”</p> <p>Any special data collected will be retained for 2 years after the completion of the study program, in case of access to records or appeals.</p>	<p>The provision of data is mandatory to allow the University to fulfil legal obligations and to guarantee the right to education for the data subjects.</p> <p>In case of non provision of the data, the granting of University services related to the right to study will be compromised.</p>
E)	<p><i>Direct Marketing.</i></p> <p>This purpose includes:</p> <ul style="list-style-type: none"> - sending promotional communications about the services offered by the University. Specifically, the sending of advertising or direct sales material for market research, commercial and promotional 	<p>Art. 6 par. 1 letter a) of the GDPR. Consent.</p>	<p>The data subject has the right to object at any time to the processing of their data. Objection, even after these email communications, will not affect the existing</p>	<p>The provision of data is optional.</p> <p>In case of non-provision, LUMSA University will not be able to send emails of a direct marketing nature.</p>



	<p>communication, newsletters, through automated means (e-mail, SMS messages, instant messaging, chat, chatbox, video messages, direct messaging from social networks - or other types - and traditional means such as phone and postal mail). The communications may contain promotional activities and/or logos of third-party partners. There will be no transfer of personal data. For a complete list of LUMSA's partners, you can write to privacy@lumsa.it.</p> <p>The Data Controller, in order to compare and possibly improve the results of automated communications, uses systems with reports. Thanks to the reports, the Data Controller can know, for example: the number of readers, openings, unique 'clickers' and 'clicks'; the devices and operating systems used to read the communication; details on the activity of individual users; details of the emails sent, delivered and not, and those forwarded. All these data are used to compare, and possibly improve, the results of communications.</p>		relationship with the university.	
F)	<p><i>Profiling of the data subjects.</i></p> <p>This purpose includes:</p> <ul style="list-style-type: none"> - the analysis of students' study paths and preferences, in order to send them targeted and more relevant communications based on their interests; - non-automated profiling: personal data will be entered into company databases/CRMs/platforms, in order to conduct analyses, evaluations, and to divide the data subjects into homogeneous groups based on specific business activity characteristics for better service management and for sending targeted promotional communications. 	Art. 6 par. 1 letter a) of GDPR. Consent.	Until consent is revoked and a maximum of 24 months after the end of the course of study.	Providing data is optional. In case of non-provision, LUMSA University will not be able to carry out profiling of the data subjects.



<p>G)</p>	<p><i>Third-party marketing.</i></p> <p>This purpose includes: - marketing carried out by LUMSA on behalf of third parties (partners with whom the University has an agreement), consisting of sending emails containing promotional communications about the services offered by the University's partner. This activity does not involve the transfer of data from LUMSA to the partner.</p>	<p>Art. 6 par. 1 letter a) of GDPR. Consent.</p>	<p>The data subject has the right to object at any time to the processing of their data. Objection, even after these email communications, will not affect the existing relationship with the university.</p>	<p>Providing data is optional.</p> <p>In case of non-provision, LUMSA will not be able to send emails on behalf of third parties.</p>
<p>H)</p>	<p><i>Sending the university newsletter.</i></p> <p>This purpose includes: - sending newsletters containing service communications from the University and informational material related to University courses offered by LUMSA University (promotion of the educational offer), orientation events, and training for the continuation of the University career.</p>	<p>Legitimate Interest. Art. 6 letter f) GDPR - soft spam. Information activities via email to the email address provided during registration and enrollment. Promotion and development of the educational offer with regard to the existing relationship between the data controller and the data subject, also considering the reasonable expectation of the data subject to receive such communications to stay informed about the progress of their university career.</p>	<p>The data subject has the right to object at any time to the processing of their data. Objection, even after these email communications, will not affect the existing relationship with the university.</p>	<p>Providing this information is optional in order to allow the university to send the University newsletter.</p> <p>If the data is not provided, the student will not be able to receive the newsletter, which includes important information for the course of study. For this reason, any objection to processing must be balanced against the interests of the data controller (see paragraph "<i>Rights of data subjects</i>").</p>
<p>I)</p>	<p><i>Participation in satisfaction surveys, with the aim of improving the educational paths and services provided.</i></p> <p>This purpose includes: - the sending of questionnaires to students taking part in face-to-face or distance learning courses to assess their satisfaction with their training;</p>	<p>The processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, provided that such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data (Recitals 47-50). Article 6(1)(f) GDPR.</p>	<p>Art. 1 Ministerial Decree May 30, 2001 (G.U. 175, July 30, 2001) "Identification of essential data on student careers."</p>	<p>Providing the data is necessary.</p> <p>In case of non-provision, the University will be unable to improve the courses and services offered.</p>



	- sending students questionnaires on the services provided to them by the university.			
L)	<p>Request concerning membership of religious communities.</p> <p>This purpose includes:</p> <ul style="list-style-type: none"> - the verification of special categories of data related to membership in religious communities for the correct calculation of the income bracket, as per the 'Enrollment Regulations'. 	<p>Art. 6 par. 1 letter a) GDPR.</p> <p>Art. 9 par. 2 letter a) GDPR.</p> <p>Consent.</p>	<p>Until the withdrawal of the data subject's consent.</p>	<p>Providing the data is optional.</p> <p>In case of non-provision, the University will be unable to correctly calculate the income brackets.</p>
M)	<p>Transfer of data to third parties.</p> <p>This purpose includes:</p> <ul style="list-style-type: none"> - the sending of data of students from LUMSA to AVIS ROMA, which will process it as the data controller, within the context of the Ministry of Health's project aimed at encouraging students to donate blood and plasma. This purpose will be pursued by AVIS ROMA through the sending of informative communications and awareness messages about blood donation, using both automated tools (e-mail, SMS, fax, MMS, social network messages, WhatsApp, Messenger, online instant messaging applications) and non-automated tools (postal mail, operator-assisted phone calls). 	<p>Art. 6 par. 1 letter a) of GDPR.</p> <p>Consent.</p>	<p>The data subject has the right to object to the processing of their data at any time by contacting the data controller - AVIS Roma- at the following email addresses:</p> <p>info@avisroma.it; PEC: avisroma@pec.it.</p> <p>The opt-out can also be exercised through the specific clause included at the bottom of the emails received from AVIS ROMA.</p>	<p>The conferral of data is optional.</p> <p>Failure to provide the data will prevent LUMSA from transferring the students' data to AVIS ROMA.</p>
N)	<p>Online teaching.</p> <p>This purpose includes:</p> <ul style="list-style-type: none"> - the delivery of education through online methods: organization of lessons and their conduct through interactive class activities (live viewing of participants, content sharing by the instructor, responses to questions, etc.). The University will stream lessons live in order to allow students who do not attend in person to access the content. 	<p>Art. 6, par. 1, letter e), 3, letter b) and 9, par. 2, letter g) of the GDPR, and articles 2-ter and 2-sexies of the Privacy Code: execution of a task in the public interest within the framework of higher education and training. The online format facilitates the continuation of the University's institutional activities and the conduct of training, promotion of study, and culture.</p>	<p>The data processed will be transmitted via live streaming. These personal data will therefore not be stored beyond the duration of the teaching session, solely with reference to the streaming of the lesson.</p>	<p>The submission is necessary for the execution of a task of public interest for the University.</p> <p>In case of non-provision, those involved will be prevented from participating in online classes.</p>



<p>O)</p>	<p><i>Recording of lessons delivered in online teaching mode.</i></p> <p>This purpose includes: - the recording and uploading to the limited-access Google Drive LUMSA platform, and in the reserved section of the e-learning portal of LUMSA, with the aim of making the content accessible to students at later times.</p>	<p>Art. 6, par. 1, letter e), 3, letter b), and 9, par. 2, letter g) of the GDPR and articles 2-ter and 2-sexies of the Privacy Code: execution of a task of public interest in the field of higher education and training. The recording of lessons and uploading to the e-learning portal aims to support students in their studies.</p>	<p>The data contained in the recordings uploaded to the e-learning portal will be kept for 2 years.</p>	<p>The provision is necessary for the recording of lessons delivered through online teaching.</p> <p>The University, through the recording of lessons, makes the content accessible to students even at later times.</p>
<p>P)</p>	<p><i>Management and execution of disciplinary measures against students.</i></p>	<p>Article 6, par. 1, letter c) GDPR. Legal obligation.</p> <p>Article 16 RDL 1071/1935.</p>	<p>Unlimited, for the final disciplinary measure. 5 years for revoked or annulled measures.</p>	<p>The provision is mandatory.</p> <p>In case of non provision, the data controller will be unable to fulfill legal obligations.</p>
<p>Q)</p>	<p><i>Preliminary and related activities for the completion of the study program and the conferment of the degree.</i></p> <p>This purpose includes: - the management of the graduation application and/or suspension of studies; - the verification of the authenticity of assignments/theses prepared by the graduates; - the conduct of the discussion, assignment of the degree title, and related legal obligations.</p>	<p>Art. 6 par. 1 letter c) GDPR - legal obligation.</p> <p>Decree No. 509 of November 3, 1999: "Art. 3 - Degrees and study programs: 1. Universities issue the following first and second level degrees: a) bachelor's degree (L); b) master's degree (LS). -Universities also issue the diploma of specialization (DS) and the doctorate (DR). [...]"</p> <p>Law No. 475 of April 19, 1925, concerning the "Suppression of the false attribution of others' works by candidates for the conferment of degrees, diplomas, offices, titles, and public dignities".</p>	<p>Art. 1 of the Ministerial Decree of May 30, 2001 (Official Gazette No. 175 of July 30, 2001) 'Identification of essential data on students' academic careers.'</p>	<p>The conferment is mandatory for the issuance of the degree and for all related and functional activities.</p> <p>In case of non provision of the data, the University will be unable to fulfill the obligations imposed by law.</p>
<p>R)</p>	<p><i>Enrollment in post-graduate courses such as university and non-university master's programs and doctoral degrees.</i></p> <p>This purpose includes:</p>	<p>Article 6, par. 1, letter e), 3, letter b), and 9, par. 2, letter g) of the GDPR and Articles 2-ter and 2-sexies of the Privacy Code: execution of a task carried out in the public interest in the field of</p>	<p>Art. 1 of the Ministerial Decree of May 30, 2001 (Official Gazette No. 175 of July 30, 2001) 'Identification of essential data on</p>	<p>The provision of data is necessary for enrollment in postgraduate courses and for managing all related</p>



	<ul style="list-style-type: none"> - the administrative and accounting management of post-graduate programs; - participation in competitive bids; - the evaluation of admission requirements for post-graduate programs; - the management of the educational and administrative relationship between the University and students, as well as the provision of specific services requested by users. <p>Further information will be provided, as needed, based on the characteristics of the specific master's program/post-graduate course.</p>	education and training in the university context.	students' academic careers.'	administrative/accounting obligations.
S)	<p><i>Support services for job placement.</i></p> <p>This purpose includes:</p> <ul style="list-style-type: none"> - managing both curricular and extracurricular internships; - related activities (e.g., signing agreements); - assistance with integration into the workforce. 	Art. 6, par. 1, letter e), 3, letter b) and 9, par. 2, letter g) of the GDPR and articles 2-ter and 2-sexies of the Privacy Code: execution of a task in public interest in the field of higher education and training.	Art. 1 of the Ministerial Decree of May 30, 2001 (Official Gazette No. 175 of July 30, 2001) 'Identification of essential data on students' academic careers.'	<p>The provision is necessary for accessing support services for job placement.</p> <p>In case of non provision, the student will not be allowed to participate in internships.</p>
T)	<p><i>Management of requests regarding personal data protection, pursuant to Articles 15 and following of the GDPR</i> (rights of the data subject).</p>	<p>The processing is necessary to fulfill a legal obligation to which the data controller is subject (C45).</p> <p>Article 6, par. 1, letter c) of the GDPR.</p>	5 years from the closure of the request, unless there are disputes.	The provision of personal data is mandatory, as it is essential for fulfilling legal obligations.

RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA

Personal data will be communicated to entities that will process the data as autonomous Data Controllers, or Data Processors (Art. 28 GDPR) and processed by individuals (Art. 29 GDPR) acting under the authority of the Data Controller and Data Processors on the basis of specific instructions given regarding the purposes and methods of processing.

The data will be communicated to recipients belonging to the following categories:

- Subjects who finance the studies of the data subject, including those with parental responsibility (as referred to in Title IX of the Civil Code), who support the data subject in their studies by covering the payment of university fees;
- Internal structures of the University for administrative/institutional purposes or to comply with legislative obligations;
- Internal administrative and technical staff for support, authorized to process data;



- External teachers and collaborators, located in Italy, for the provision of lessons and other services mentioned among the purposes;
- Certifying authorities during the verification of substitute declarations made for the purposes of DPR 445/2000;
- Entities, located in Italy, that provide services for the management of the information system used by LUMSA Libera Università Maria Ss. Assunta and telecommunications networks;
- Subjects, located in Italy, that provide services related to the sending of the University newsletter;
- freelancers, firms, or companies, located in Italy, within the context of assistance and consultancy relationships;
- providers/managers of external platforms, located also outside the European Economic Area (see below), for the provision of the services mentioned above among the purposes (e.g., website hosting, cloud and email services, tools for distance learning);
- third parties such as private companies and entities affiliated with the University, located also outside the European Economic Area (see below);
- AVIS ROMA, in case of consent to the transfer of data to third parties;
- Competent authorities for compliance with legal obligations and/or provisions from public bodies, upon request.

The list of Data Processors as per Article 28 is available by writing to privacy@lumsa.it or to the other contact details mentioned above

DATA TRANSFER TO A THIRD COUNTRY AND/OR INTERNATIONAL ORGANIZATION

Personal data will be transferred to non-EEA countries, in compliance with the limits and conditions set out in Articles 44 et seq. of the GDPR.

In particular, transfers will occur in the following cases. Data will be transferred:

- to foreign authorities, upon request, if necessary to verify academic qualifications for professional reasons or for the continuation of studies;
- to embassies abroad, including for exemptions, for example in the case of military service;
- to non-EEA universities as part of international student exchange programs for incoming and outgoing students;
- to companies/entities in the event of internships abroad;
- in the case of international students, to universities abroad, including non-EEA, from which the student originates.

The transfer is based on Article 49 "derogations in specific situations," paragraph 1, letters b) and c), of GDPR namely:

- Letter b): transfer necessary for the performance of a contract between the data subject and the data controller;
- Letter c): transfer necessary for the performance of a contract between the data controller and another natural or legal person in favor of the data subject.

In the context of providing cloud-based services and for the purpose of conducting remote lessons, LUMSA relies on providers whose data centers are also located outside the EEA. The Data Controller has therefore evaluated the conditions underlying the data transfer and the related guarantees by analyzing contracts and information such as security certifications provided by the service provider in question. In particular, the use of Google's suite of services (the so-called "GApps") and Google Meet, involves the transfer of data to Google LLC, Mountain View, California, 94043. This transfer is based on the adequacy decision of the EU Commission, pursuant to Article 45 of the GDPR, regarding the safe and reliable flow of data between the EU and the USA (the so-called EU-U.S. Data Privacy Framework). Google LLC is among the entities adhering to and certified under this framework (for more information, see <https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt000000001L5AAI&status=Active>).

In any case, data subjects are free to request further information about the transfers made and the related guarantees, pursuant to Articles 44 and following of the GDPR, by contacting the Data Controller at the email address privacy@lumsa.it.

AUTOMATED PROCESSES

Personal data will be processed manually, electronically, and automatically. It is specified that no fully automated decision-making processes are carried out.



RIGHTS OF DATA SUBJECTS

Data subjects may assert their rights as expressed by EU Regulation 2016/679, Articles 15 and following, by contacting the Data Controller by writing to privacy@lumsa.it or the Data Protection Officer as per Article 38, paragraph 4, by writing to dpo.lumsa@dpoprofessionalservice.it or to the PEC address dpo.lumsa@pec.dpoprofessionalservice.it.

The Data Controller guarantees data subjects the right to request, at any time, access to their personal data (Article 15), rectification (Article 16), deletion of the same (Article 17), and limitation of processing (Article 18). The Data Controller communicates (Article 19) to each of the recipients to whom personal data has been transmitted any rectifications, deletions, or limitations of processing carried out. The Data Controller informs data subjects about such recipients upon request.

The Data Controller guarantees the right to data portability (Article 20) and, in the case of requests under Article 20, will provide data subjects with the data in a structured, commonly used, and machine-readable format.

Data subjects have the right to object (Article 21), at any time, to the processing of their data based on legitimate interest or on the performance of a task carried out in the public interest or related to the exercise of public authority vested in the Data Controller, by writing to the above contacts with the subject "objection." In the event of exercising the right to object to processing based on legitimate interest, the Data Controller recognizes the right of data subjects to obtain information, upon request, about the balancing test conducted.

Data subjects have the right to withdraw consent given, without affecting the lawfulness of processing based on consent prior to withdrawal.

To stop receiving automated direct marketing communications (email, SMS messages, instant messaging, chat, chatbox, video messages, direct messaging from social networks, or others), please send an email to privacy@lumsa.it with the subject "unsubscribe from automated" or use our automatic unsubscription systems provided for emails only (opt-out).

To stop receiving traditional direct marketing communications (calls with operators and paper mail), please send an email to privacy@lumsa.it with the subject "unsubscribe from traditional."

To stop receiving any marketing communications, please send an email to privacy@lumsa.it with the subject "unsubscribe from marketing."

You can revoke consent to profiling (non-automated) by writing an email to privacy@lumsa.it with the subject "no profiling."

If data subjects believe that the processing of personal data by the Data Controller occurs in violation of what is provided for by Regulation (EU) 2016/679, they are free to lodge a complaint with the national supervisory authority, particularly in the member state where they habitually reside or work, or in the place where the alleged violation of the Regulation occurred (Italian Data Protection Authority: <https://www.garanteprivacy.it/>), or to take appropriate legal action.

MODIFICATION OF PRIVACY POLICY

The Data Controller reserves the right to change, update, add or remove portions of this Privacy Policy at its discretion and at any time. In order to facilitate such review, the notice will contain an indication of the date of update.

Data di aggiornamento: October 22, 2024

THE DATA CONTROLLER - STAMP AND SIGNATURE