

Privacy Notice on the Processing of Personal Data

pursuant to Article 13 of Regulation (EU) 2016/679 (hereinafter the “Regulation” or “GDPR”)

Dear Sir/Madam,

With this notice, provided pursuant to Article 13 of Regulation (EU) 2016/679 (“GDPR”), the Università Campus Bio-Medico di Roma, with registered office in Rome (RM), Via Álvaro del Portillo no. 21, ZIP code 00128, as Data Controller (hereinafter “Controller” or “University”), informs you about the processing of your personal data submitted as part of your application, enrollment, and participation in courses promoted and organized by UCBM Academy (e.g., First- and Second-Level Master’s Degrees, advanced training courses, executive courses, hereinafter “courses”).

The University has appointed a Data Protection Officer (DPO), who can be contacted at:

- email: dpo@unicampus.it
- postal mail: Università Campus Bio-Medico di Roma, Via Álvaro del Portillo no. 21, 00128 Rome, for the attention of the Data Protection Officer

Categories and Types of Personal Data Processed

Within the scope of your application and participation in courses, the Controller may process:

- Common personal data: identification and personal details (name, surname, place and date of birth, tax code), contact data (email, address, phone number), identity documents, payment data (e.g. bank details and payment receipts), education data (degree, graduation year), CV and any information related to course participation
- Special categories of data (Art. 9 GDPR): data relating to health (e.g. disabilities, specific learning disorders – SLD), where necessary to provide appropriate support measures

Purposes and Legal Basis of Processing

Your personal data will be processed for the following purposes:

a) for the management of your application and the execution of the related selection procedures (e.g. written tests, interviews and/or assessment of requirements), pursuant to Article 6(1)(b) of the Regulation. Specifically, during the organization and conduct of admission procedures, your personal data will be processed for the preparation of examination tests, the assignment of scores, the possible allocation of additional points for qualifications where предусмотрено by the call, and the establishment of the final ranking.

The provision of your personal data for this purpose is optional; however, failure to provide such data will make it impossible to submit your application and participate in the selection procedures (“Purpose of managing your registration for admission procedures to the courses”);

b) should the selection procedure be successfully completed, your data will also be processed for the management of enrollment and subsequent participation in the courses, as well as for managing relations with the University within the context of the educational activities provided, including administrative, accounting and tax-related aspects, the sending of institutional and service communications, and the handling and response to your requests (“Purpose of participation in the courses”);

c) to promote inclusion and ensure equal access to courses for students with disabilities or specific learning disorders (SLD), by providing appropriate measures, support services, and personalized assistance in order to enable and ensure the proper organization and conduct of admission procedures and/or adequate participation in the courses (“Purpose of managing disabilities or specific learning disorders”).

The provision of personal data for the purposes referred to in points a), b), and c) is generally optional; however, in certain cases it may constitute a necessary requirement for participation in admission procedures, enrollment in courses, and the continuation of the educational path. Failure to provide such data will not result in any consequences for you; however, in the aforementioned cases where the data is required, it may be impossible to proceed with admission and enrollment in the courses or to allow you to continue your educational program.

The legal basis for processing your data for the purposes referred to in points a), b), and c) is found in Article 6(1)(b) and (e), as well as Article 6(3)(b) of the Regulation and, with regard to special categories of data, in Article 9(2)(g) of the Regulation and Articles 2-ter and 2-sexies, letters aa) and bb), of the Italian Privacy Code, as such processing is necessary to allow data subjects to enroll in and participate in the courses offered by UCBM Academy of the University and is functional to the provision and management of educational and training activities in the academic and professional context.

Once provided, personal data may be processed for the following purposes:

d) for the direct sending by the University, via email, of commercial communications, advertising, and promotional material relating to the direct sale of services similar to those you have previously purchased from the University (e.g. training courses), without your

consent, pursuant to Article 130(4) of the Italian Privacy Code and Article 6(1)(f) of the GDPR. Pursuant to Article 21 of the GDPR, you have the right to object to the processing of your data for this purpose at any time, either initially or in connection with subsequent communications, easily and free of charge, including by contacting the Data Protection Officer (DPO) at the contact details provided in this notice or by using the link included at the bottom of each such email communication;

e) where the course in which the data subject is enrolled includes a curricular internship at companies or institutional partners of the University, personal data – including the curriculum vitae – will be processed in order to allow the sharing of participants' CVs with the companies/institutional partners specifically involved in the course, enabling them to assess candidates' profiles and select participants to whom to offer internship opportunities. Such processing is necessary to ensure the proper implementation of the educational program, of which the internship constitutes an integral and mandatory part, and to facilitate the matching between students and professional organizations consistent with the educational path.

The legal basis for this processing is the legitimate interest of the Controller, pursuant to Article 6(1)(f) of the GDPR, identified in the need to ensure the effective implementation of the training program, including its practical and professional components, in compliance with the provisions set out in partnership agreements governing the relationships between the University and the companies/institutional partners ("Purpose of sharing CVs for internship placement");

f) to send you informational and promotional material regarding activities in the fields of higher education, biomedical and engineering research carried out by the University, including customer satisfaction activities and the sending of newsletters, with the aim of promoting fundraising campaigns, through automated means (SMS, MMS, email, automated calling systems without operator, social media, WhatsApp) and non-automated means (postal mail, telephone with operator) ("Fundraising purposes").

The legal basis for the processing of personal data for the above-mentioned purpose is your consent pursuant to Article 6(1)(a) of the Regulation. It should be noted that the Controller will collect a single consent in accordance with the General Provision of the Italian Data Protection Authority entitled "Guidelines on promotional activities and spam prevention" of 4 July 2013.

You retain the right to object to the processing pursuant to Article 21 of the Regulation or to withdraw the consent given pursuant to Article 7 of the Regulation, even partially, for example by objecting to or withdrawing consent solely with regard to communications sent via automated means.

Such consent also extends to communications sent by traditional means (postal mail and telephone with operator) for individuals who are not in regular contact with the Controller and may be withdrawn at any time by the data subject pursuant to Article 7 of the Regulation, without affecting the lawfulness of processing carried out prior to the withdrawal.

For this purpose, the provision of data is optional; failure to provide such data will not result in any consequences.

g) to carry out general analysis activities on an aggregated basis, without any individualized impact, aimed at evaluating participation in educational offerings and, more generally, the academic experience, including descriptive, predictive analyses and strategic assessments for the development of statistical reports (“Purpose of aggregated analysis of educational offerings and academic experience”). The legal basis for processing for the above purpose is the legitimate interest of the Controller pursuant to Article 6(1)(f) of the GDPR. Such interest lies in the need to improve educational offerings and the academic experience through a more in-depth and comprehensive understanding and analysis of the student body;

h) to comply with any obligations established by applicable laws, regulations, or EU legislation, or to respond to requests from competent authorities, pursuant to Article 6(1)(c) of the Regulation (“Compliance purposes”);

i) where necessary to establish, exercise, or defend a legal claim in judicial proceedings, pursuant to Articles 6(1)(f) and 9(2)(f) of the Regulation (“Legal defense purposes”).

Data Processing Methods

Personal data is processed using manual, IT, and telematic tools, according to logic strictly related to the purposes of processing and, in any case, in a manner that ensures the confidentiality and security of the data, in compliance with the Regulation and the applicable provisions issued by the Data Protection Authority.

Further information is available by contacting the Data Protection Officer (DPO) at the contact details indicated above.

Recipients of Personal Data

Your personal data may be shared, for the purposes indicated above, with the following parties (the “Recipients”):

- entities that, in providing services to the University, process personal data on behalf of the University, typically acting as data processors pursuant to Article 28 of the GDPR;
- individuals authorized by the Controller to process personal data pursuant to Articles 29 of the GDPR and 2-quaterdecies of Legislative Decree no. 196/2003 (the so-called “Privacy Code”), who are bound by confidentiality obligations or subject to an appropriate legal duty of confidentiality (e.g. employees, collaborators, etc.);
- entities or private companies acting as institutional partners of the courses delivered by UCBM Academy, acting as independent data controllers, for the purpose of

evaluating candidates and, where applicable, offering internship opportunities within the data subject's educational path;

- entities, bodies, or authorities, acting as independent data controllers, to whom your personal data must be disclosed in compliance with legal obligations or orders issued by competent authorities.

The updated and complete list of Recipients may be requested by contacting the Data Protection Officer (DPO) at the contact details indicated above.

Data Retention Period

Personal data will be processed and retained for the time strictly necessary to achieve the purposes for which it was collected, in compliance with the principles of data minimization and storage limitation set out in Article 5(1)(c) and (e) of the GDPR.

In particular, personal data processed for the purposes referred to in points a), b), and c) of paragraph 2 of this notice will be retained for the time strictly necessary to carry out the selection procedures and to allow enrollment and attendance of the course and, in any case, for the entire duration of your relationship with the University.

Personal data, and in particular identification and contact data, processed for the purposes referred to in paragraph 2, letter f) of this notice, will be processed until you withdraw your consent pursuant to Article 7 of the Regulation.

With regard to the soft spam purposes referred to in paragraph 2, letter d) of this notice, your identification and contact data will be processed until you object to such processing pursuant to Article 21 of the Regulation.

Personal data processed for the purposes referred to in paragraph 2, letters e) and g) of this notice will be retained for as long as your academic relationship with the University continues and as long as the Controller retains an interest in their retention for its institutional and educational purposes.

Personal data processed for the purposes referred to in paragraph 2, letter h) of this notice will be retained for the period required by the applicable legal obligation or regulation.

The Controller also reserves the right to retain personal data for as long as necessary to establish, exercise, or defend its rights, whether in judicial proceedings or in out-of-court contexts, including in the stages preceding litigation.

Further information regarding data retention periods and the criteria used to determine such periods may be requested by contacting the Data Protection Officer (DPO) at the contact details indicated above.

Your Privacy Rights under Articles 15-22 of the GDPR

As a data subject, you may exercise the following rights at any time:

Right to withdraw consent (Art. 7 GDPR) – You have the right to withdraw at any time any consent you may have given, without affecting the lawfulness of processing carried out prior to the withdrawal;

Right of access (Art. 15 GDPR) – You have the right to obtain confirmation as to whether or not personal data concerning you are being processed, and the right to receive all information relating to such processing;

Right to rectification (Art. 16 GDPR) – You have the right to obtain the rectification of your personal data if it is incomplete or inaccurate; please note that, with regard to personal data collected through audio and video recording systems, the right to rectification cannot practically be exercised due to the intrinsic nature of such data, which pertain to an objective and determined fact;

Right to erasure (Art. 17 GDPR) – In certain circumstances, you have the right to obtain the erasure of your personal data stored in our archives;

Right to restriction of processing (Art. 18 GDPR) – Under certain conditions, you have the right to obtain restriction of processing of your personal data;

Right to data portability (Art. 20 GDPR) – You have the right to obtain the transfer of your personal data to another data controller, as well as the right to receive your data in a structured, commonly used, and machine-readable format;

Right to object (Art. 21 GDPR) – You have the right to object, in whole or in part, to the processing of your personal data, providing reasons justifying your objection; the Controller reserves the right to evaluate such requests, which may not be accepted if there are compelling legitimate grounds for processing that override your interests, rights, and freedoms. You also have the right to object at any time, without justification, to the sending of promotional communications and communications aimed at market research, surveys, knowledge-gathering, fundraising initiatives, statistical surveys, and satisfaction questionnaires, whether through automated or non-automated means. With regard to such communications, you may exercise this right partially, for example by objecting only to the sending of promotional communications through automated means.

Furthermore, if you believe that the processing of your Personal Data violates data protection laws, you are informed that, pursuant to Article 77 of the GDPR, you have the right to lodge a complaint with the supervisory authority of the EU Member State in which you usually reside, work, or where the alleged violation occurred, or to seek judicial remedies pursuant to Article 79 of the GDPR.

To exercise the rights listed above, you may write to the Data Protection Officer (DPO) at the registered office in Rome at Via Álvaro del Portillo n. 21, c/o Data Protection Officer, or by e-mail at dpo@unicampus.it