

## INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA

Enrollment at RUFA and attendance and participation in courses, lessons and, in general, in RUFA's educational activities involves the collection of information that constitutes personal data pursuant to Legislative Decree no. 196/2003 and subsequent amendments as well as of Reg. (EU) 2016/679 ("GDPR"). For this reason, all information on the processing of personal data related to enrollment is provided here.

### **1. Data controller**

The data controller is ROME UNIVERSITY OF FINE ARTS – Academy of Fine Arts, based in via Benaco, 2 - 00199 Rome (the "Controller").

It is possible to contact the Controller at any time through the following addresses:

- e-mail [privacy@unirufa.it](mailto:privacy@unirufa.it)
- address via Benaco, 2 - 00199 Rome.

### **2. Data processed**

#### Personal data and contacts

Enrollment and attendance and participation in the courses, lessons and, in general, the educational activity of the Data Controller also requires students to provide - by filling in the appropriate matriculation and enrollment application - information such as his/her name, surname, place and date of birth, nationality, residence / home address, , Equivalent Economic Situation Indicator (ISEE), level of education and qualification (the "Personal Data"), as well as telephone number and e-mail address (the "Contact Data") and all other personal data contained in the identification documents attached to the matriculation and enrollment application. The data is necessary for the valid formalization of the matriculation request and enrollment in the services offered by the Data Controller.

#### Particular types of Data

In the event of students with disabilities or special needs, the Data Controller will acquire, in addition to the Personal Data and Contact Data necessary for matriculation, also some data relating to the student's state of health in order to provide him/her with some benefits regarding the payments, as well as for educational purposes, also related to the logistic organization.

#### Images of the participants in the Contest

In carrying out the educational and training activities in which the student is matriculated and enrolled, the Controller will acquire videos and / or images extracted from them made by employees, collaborators and the Controller and / or other students (the "Materials"). The Materials may contain personal data that could be

promptly associated with identified subjects and could by their very nature allow the identification of the Data Controller's students and / or collaborators.

### **3. Purpose and legal basis of the processing**

The Materials, Personal Data and Contact Data and, only in the case of a student with disabilities and / or special needs, the particular categories of data related to him/her (hereinafter, jointly, the "Data") provided will be used exclusively for: (i) the receipt, evaluation, acceptance of the matriculation and enrollment application submitted by the student and its full formalization; (ii) access to forms of concessions and / or financing, on an ISEE basis, for the right to study and the calculation of academic fees; (iii) access and creation of a student profile on the Controller's career platform in accordance with the platform's privacy policy: <https://www.unirufa.it/en/privacy-policy-symplicity-alumni-e-studenti/>; (iv) the collection, organization and diligent storage of releases; (v) sending and receiving promotional communications and updates on the Data Controller's initiatives and activities; and (iv) with exclusive reference to the Materials, disseminating the Materials themselves by publication and dissemination, in any form, on the various communication channels of the Controller such as, for example, posters and advertising pages, flyers, leaflets, annual reports, advertising spots video, TV and web, social networks (such as Facebook®, Instagram® and Twitter®) as well as on the website of the Controller, also in the form of advertising.

The legal basis on which the treatment referred to in points (i) and (ii) is based is the implementation of a contract of which the student, as an interested party, is part of; with reference to the treatment referred to in points (iii) and (iv), it is the consent of the students matriculated with the Data Controller, provided by ticking the appropriate box at the bottom of this information notice.

### **4. Recipients of the data communication**

The Data will be communicated and may be known by: (i) employees and collaborators of the Data Controller, duly designated for the processing; (ii) third parties who provide additional or fundamental services to the management of the Holder's academic activity, enrollment and registration requests, duly appointed as external data processors or independent holders; (iii) third parties, IT services providers, IT consultancy, e-mail marketing, duly appointed as external data processors or independent data controllers, for the management of internal IT systems, company management and the career platform, including the " sending electronic communications and newsletters; (iv) the companies that manage the social network and / or instant messaging platforms for the possible publication of the Materials; and finally (v) consultants, as independent owners, for the management of administrative

and fiscal activities, for the management of disputes and for legal assistance in the event of any disputes that require their involvement. In any other case, the Data will not be disclosed to third parties, unless this is necessary to fulfill requests from public authorities.

#### **5. Place of data processing**

Data processing will take place at the aforementioned headquarters of the Data Controller. The Data will be stored on servers and / or physical archives located exclusively within the European Union. In any case, no processing or transfer of data will be carried out outside the territory of the European Union or countries that do not provide adequate guarantees for the protection of personal data. With regard to the publication of the Images on social networks: the companies that manage these platforms (Facebook®, Instagram®, Twitter® and YouTube®) have adopted measures to comply with the European legislation on international data transfer in order to guarantee an adequate level of data protection and based on the EU standard contractual clauses (SCC, Standard Contractual Clauses), continuing in any case to respect the principles of the previous framework of the so-called Privacy Shield (for which they had obtained certifications under the EU-US and EU-Swiss Privacy Shield. More information on the management of personal data by these platforms is available in their terms and conditions.

#### **6. Processing methods, retention period and security measures**

The Data Controller will process the Data with and without the aid of electronic, IT or automated tools, adopting specific and adequate logical, organizational and technical security measures to prevent the loss of Data or their unauthorized or illegal use.

The Data will not be processed and stored for a period of time exceeding that strictly necessary to achieve the purposes for which they were collected. In particular, a period that allows: (i) the student to attend courses and lessons organized and provided by the Controller; (ii) to collect, organize and keep in an orderly manner the matriculation applications and the release forms; and (ii) to publish the Materials also for promotional purposes.

The Data contained in the matriculation and enrollment applications and in the releases will be kept for a period equal to that provided for by the laws on the prescription period.

#### **7. Obligation to provide the data**

The provision of data for the purposes referred to in paragraph 3 (iii) is optional. Furthermore, students are not required to allow the collection of Materials containing

their own image; in case of refusal, the student can still continue to attend courses and lessons and access the educational and training services offered by the Controller.

**8. The right of the interested party**

The students, as interested parties (i.e. subjects to whom the Data refers to), are holders of rights conferred to them by the GDPR. In particular, pursuant to art. 15-23 of the GDPR they have the right to request and obtain, at any time, access to their personal data, information on the processing carried out, the correction and / or updating of personal data, the cancellation and limitation of processing. Furthermore, they also have the right to object to the processing and to request data portability (i.e. receive personal data in a structured format of common use, readable by automatic devices). Finally, the interested parties always have the right to withdraw their consent at any time (this, in any case, will not affect the lawfulness of the processing carried out by the Data Controller based on the consent given before the revocation) and to lodge a complaint with a supervisory authority. (in Italy: the Guarantor for the Protection of Personal Data). In order to exercise the rights, it is always possible to contact the Data Controller at the addresses indicated above.