



INFORMATION TO SUPPLIERS AND CLIENTS on the processing of personal data (pursuant to the EU Regulation 2016/679)

Introduction

Pursuant to article 13 of the EU Regulation 2016/679 (“GDPR”) on the protection of individuals with regard to the processing of their personal data, and on the free movement of such data, which repeals Directive 95/46/EC, the University of Milan, as Data Controller, informs all its suppliers and clients on the processing of their personal data.

The above is without prejudice to compliance by the University of Milan with legislation in force governing transparency and mandatory publication of data and documents.

1. Data Controller and Data Protection Officer (DPO)

The Data Controller is the University of Milan, and specifically the pro tempore Rector, Via Festa del Perdono n. 7, 20122 Milan, e-mail infoprivacy@unimi.it.

Pursuant to articles 37 et seq of the EU Regulation 2016/679, the University has appointed Pierluigi Perri, c/o Department “Cesare Beccaria”, Via Festa del Perdono n. 7, 20122 Milan, e-mail dpo@unimi.it, as the Data Protection Officer (DPO).

2. Purpose and legal basis of processing

The data being processed are personal data, contact details, institution or company of reference, and data relating to criminal convictions or offences and associated security measures, pursuant to art. 10 of GDPR, related to natural persons who in various capacities have commercial relationships with the University of Milan, and subjects who hold roles in companies and third parties on which the controls required by law must be carried out, acquired in the University archives during contractual transactions.

Personal data are processed solely within the scope of the University’s institutional purposes, in relation to contractual requirements and the consequent fulfilment of contractual and tax obligations, in compliance with the law provisions.

The legal basis for processing is a) as regards the processing of data pursuant to art. 10 of GDPR, compliance with obligations under EU law, legal or regulatory provisions or general administrative acts, and b) as regards the processing of personal data, the need for processing for the execution of a contract of which the data subject (or the institution or company of reference) is a party, or for the execution of pre-contractual measures, and the processing for the management of any complaints or disputes and for the prevention and repression of fraud and any illegal activity.

The provision of data is a mandatory requirement for engaging with the University; failure to provide data makes it impossible for the data subject (or the institution or company of reference) to participate in public tender procedures, to enter into a contract for the supply of goods, services or labour, and / or to continue the commercial relationship with the University of Milan.

3. Means of data processing

The acquisition of data takes place in accordance with principles of adequacy, relevance and limitation to what is necessary in relation to the purposes for which they are processed. Personal data are processed in accordance with principles of lawfulness, fairness, and transparency, as required by article 5 of GDPR,



including through the use of digital tools designed to store and manage such data, and however in such a manner as to ensure the security of personal data and safeguard the data subject's confidentiality.

4. Categories of recipients of the personal data

Personal data shall be processed in accordance with applicable legislation in force, by the University's employees (persons authorised to process personal data) in accordance with their functions as per the University organisational chart.

Personal data could also be forwarded:

- a) to external entities identified as Data Processors pursuant to article 28 of GDPR;
- b) to public and/or private entities entitled to do so by law or regulation; in particular, personal data may be disclosed to social security, welfare and insurance institutions, insurance companies, the State Attorney, Consip, Anac, the Ministry of Infrastructure and Transport, the Ministry of Economy and Finance.

In any case, it is allowed the communication of data requested, in accordance with law, by public security authorities, law courts or other public entities for the purposes of defence, state security and investigating criminal offences, in addition to forward such data to the law courts, in compliance with legal obligations, where it is suspected that criminal offences have been committed.

In any case, it is allowed the disclosure of personal data necessary for the purposes of administrative transparency regulations.

Aside from the aforementioned cases, personal data will not be forwarded or disseminated.

Finally, personal data are not subject to transfer to third countries or to international organisations.

5. Data Retention Period

Personal data shall be kept by the University for the period of time indicated, for each type of document, in the "Guidelines on retention timeframes and the manner in which administrative documents are disposed of" published on the University's website at link <https://work.unimi.it/servizi/protocollo/102631.htm>.

6. Data Subject's Rights

Pursuant to articles 15 to 22 of GDPR, should all conditions be met, the Data Subject may exercise his or her right to ask the Data Controller for access to personal data relating to him or her, rectification or erasure of his or her personal data, restrictions on processing and data portability, where applicable, by contacting the Responsabile della Protezione dei Dati [Data Protection Officer], c/o Dipartimento "Cesare Beccaria", Via Festa del Perdono n. 7, 20122 Milano – e-mail: dpo@unimi.it.

7. Right to object

Pursuant to article 21 paragraph 1 of GDPR, the Data Subject may, at any time, object, on grounds relating to his or her specific situation, to the processing of personal data concerning him or her undertaken pursuant to article 6, paragraph 1, subparagraph e) and specifically when the legal basis of data processing is performing a public interest duty, applying to the following contact address: Responsabile della Protezione dei Dati [Data Protection Officer], via Festa del Perdono, 7, 20122 Milano - e-mail: dpo@unimi.it.

8. The right to file a complaint with an oversight authority or a law court

The Data Subjects who believe that personal data relating to them has been processed in breach of the provisions of GDPR are entitled to lodge a complaint with the Data Protection Authority as contemplated by article 77 of GDPR, or to take the case before appropriate courts pursuant to article 79 of GDPR.



9. Amendments to information

This information may later be amended. You are therefore advised to check, in the Privacy section of the website <http://www.unimi.it>, that the version referred to is the most updated one.

THE RECTOR

Elio Franzini