Privacy and Cookie Policy

Introduction

Pursuant to art. 13 of Regulation (EU) 2016/679 (General Data Protection Regulation or GDPR), the University of Milan (hereinafter also referred to as "the University"), represented by the Rector *pro tempore*, hereby provide users of the SP - Service Provider service (hereinafter also "sp.unimi.it") with information on the use of their personal data.

1. Data Controller and Data Protection Officer (DPO)

The Data Controller is the University of Milan, represented by the Rector *pro tempore* (Via Festa del Perdono 7, 20122 Milan, email address: <u>supportodpo@unimi.it</u>).

In accordance with articles 37 et seq. of Regulation (EU) 2016/679, the University has appointed Professor Pierluigi Perri (Department of Law "Cesare Beccaria", Via Festa del Perdono 7, 20122 Milan, email address: <u>dpo@unimi.it</u>) as Data Protection Officer (DPO).

2. Types of data processed and purpose of the processing

The University may process the following data:

- browsing data, such as the user's first name, surname, email address and persistent unique identifier within the university or institution;
- data collected via cookies while the user is visiting the website. For further information on the cookies used by the website, see paragraph 5.

In compliance with applicable laws and regulations, other data may be collected for security purposes (spam filter, firewall, virus detection), to prevent any attempt to cause damage to the website or its users, as well as any other harmful or criminal activities. In any case, these data will never be used for profiling purposes, but only to protect the website and its users.

3. Legal basis for data processing

The legal basis for data processing is the performance of tasks carried out in the public interest by the Data Controller, in accordance with point (e) of art. 6(1) of the GDPR.

4. Means of data processing

Data are collected in line with the principles of relevance, completeness and limitation to what is necessary in relation to the purposes for which they are processed. The personal data collected are processed in accordance with the principles of lawfulness, fairness and transparency established in article 5 of the GDPR, also by using ICT tools to store and

manage said data, and in any case in such a manner to ensure data security and confidentiality.

5. Use of cookies

Cookies are text files that are stored on the user's device to ensure a safe and efficient browsing experience and monitor the user's actions on the website.

The website uses technical cookies (functional cookies, session cookies and/or persistent cookies) and other similar cookies to function and display properly, to allow authentication to restricted areas of the website, or to improve the browsing experience (for instance by remembering user preferences, or by sparing users from having to re-enter their username and password multiple times).

Since their installation does not require user consent, these cookies are always used and sent to the browser, and the only way for users to disable them is by changing their browser settings. However, disabling cookies may prevent users from fully accessing the services and content made available through the website.

The name and origin of technical cookies are dependent upon the authentication system used, as access is also allowed through federated user identity.

The website does not use profiling cookies, nor uses cookies for purposes other than those set out herein.

6. Parties authorised to process data and to whom data may be disclosed

Users' personal data will be processed by the University's staff tasked with managing the website and involved in the related activities (i.e. persons designated as authorised to process data), in compliance with applicable laws and regulations.

Data may be disclosed to:

- not-for-profit public bodies or consortia of which the University is part (e.g. the Italian Ministry of University and Research — MUR), where the disclosure of data is necessary for the requesting body to be able to perform its institutional duties;
- external parties identified as Data Processors pursuant to art. 28 of the GDPR;
- law enforcement authorities, judicial authorities or other public bodies for the purposes of defence, State security and criminal investigations, in compliance with legal obligations and where criminal offences are suspected.

Other than in the above cases, personal data will not be communicated or circulated to third parties.

Lastly, personal data will not be transferred to third countries or international organisations.

7. Data retention period

Data will be stored for as long as required by law, or for the time necessary to achieve the purpose of the processing. More specifically, technical cookies will be stored for the duration of the user's session.

8. Rights of data subjects

Pursuant to art. 15 to 22 of the GDPR, subject to the relevant conditions being met, data subjects may exercise their right to request from the Controller access to, rectification or erasure of their personal data, or restrictions of processing, by contacting the Data Protection Officer (Professor Pierluigi Perri, Department of Law "Cesare Beccaria", Via Festa del Perdono 7, 20122 Milan – email address: dpo@unimi.it).

9. Right to object

Pursuant to art. 21(1) of the GDPR, data subjects may object, on grounds relating to their particular situation, at any time to processing of personal data concerning them which is based on point (e) of art. 6(1), i.e. when the legal basis of the processing is the performance of a task carried out in the public interest. To exercise their right to object, data subjects should contact the Data Protection Officer (Professor Pierluigi Perri, Via Festa del Perdono 7, 20122 Milan – email address: <u>dpo@unimi.it</u>).

10. Right to lodge a complaint

Data subjects who consider that the processing of their personal data via this website infringes the provisions of the GDPR are entitled to lodge a complaint with the Italian Data Protection Authority (*Garante*), as per art. 77 of the GDPR, or to take the case before the competent court (art. 79 of the GDPR).