



ADMISSION TEST THROUGH TELEMATIC SYSTEMS

Policy for the Processing of personal data collected from the person concerned art. 13 of EU Reg. 2016/679 – GDPR

If you are a minor, before communicating your data to the University, please read the information carefully together with your parents or whoever takes their place, as well as ask your parents or whoever exercises parental responsibility to express, by means of flags, consent to the processing of your personal data of a particular nature for the purpose B) referred to in point 2 of the information. Parents or any legal representatives of underage users can exercise their rights by writing to privacy@iulm.it.

1. DATA PROCESSORS

The **DATA CONTROLLER** pursuant to articles 4 and 24 of EU Reg. 2016/679 is **Libera Università di Lingue e Comunicazione IULM**, with headquarters in Via Carlo Bo 1 - 20143 Milan, in the person of its pro-tempore legal representative.

The University, in accordance with art. 37-39 Reg. UE 2016/679, appointed Data Protection Officer, who can be contacted at the following email address: dpo.iulm@dpoprofessionalservice.it.

2. DATA PROCESSED

Personal and contact data, image and voice, IP address.

The interviews and tests will take place in streaming mode, through the use of the candidate's webcam. The image and the voice of the candidates will not be recorded or disseminated.

The candidate will be asked to show their identity document in streaming for the sole purpose of allowing the University to recognize it.

In order to allow verification of the validity of the test and reduce the possibility of fraud, during the tests a physical operator, upon request to the candidate to keep the webcam switched on for the duration of the test, will carry out a surveillance activity.

3. PURPOSE AND LAWFULNESS OF PROCESSING

Personal data shall be processed lawfully, in compliance with the provisions of art. 6 of EU Reg. 2016/679, for the following purposes:

pursuant to art. 6, par. 1, lett. e)

- allow the verification of the hardware and software requirements of the candidate's personal PC in order to allow him access to the platforms used to carry out the test;
- allow the candidate to be recognized;
- allow the carrying out of the admission tests to the degree courses with limited numbers and the tests for the evaluation of the initial preparation, where required, and the related administrative activities;
- allow the University to proctoring during the test in order to reduce the possibility of fraud.

pursuant to art. 6, par. 1 lett. e) and art. 9 par. 2 lett. g)

- identify suitable tools to facilitate the carrying out of the selection test in case of disability or in the presence of specific learning disorders;
- allow students with disabilities (pursuant to Law 104/1992) or with specific learning disorders to take the test with additional time and compensatory measures.

The personal data of Data Subject and the results obtained in the tests may also be subject, in anonymized form, to processing also for statistical or scientific research purposes or to identify actions aimed at improving educational services.

4. DATA RECIPIENTS OR RECIPIENT CATEGORIES

Personal data will be disclosed to the following recipients:

- **Microsoft Corporation**, autonomous data controller, which will provide the Teams platform in order to allow the connection between the candidate and the University (information available at the link: <https://privacy.microsoft.com/it-IT/privacystatement#mainnoticetoendusersmodule>)
- **Giunti Psychometrics**, appointed by IULM as Data Processor, pursuant to art. 28 of EU Reg. 2016/679, which will provide the platform for carrying out the test.

Furthermore, data may be transferred to recipients in the following categories:



- professional psychologists in charge of supporting subjects affected by DSA;
- internal structures of the University, in charge of managing student enrollment and careers, services that deal with defining actions aimed at improving quality and teaching;
- entities carrying out maintenance on the information system and the data collection platform;
- embassies or consulates (in relation to any visa issued).

Subjects belonging to the abovementioned categories shall become Data Processors, or shall operate in a completely autonomous way, as Data Controllers in their own right. The list of designated Data Processors is constantly updated and is available at the offices of IULM University.

5. DATA TRANSFER TO THIRD COUNTRIES AND/OR INTERNATIONAL ORGANISATIONS

Personal data will not be transferred abroad within or outside the European Union.

6. STORAGE PERIOD OR CRITERIA

Data shall be processed automatically and/or manually, in a manner and with tools that ensure maximum security and confidentiality, by specifically appointed subjects.

In compliance with the provisions of art. 5 paragraph 1 letter. e) of EU Reg. 2016/679 the personal data provided as well as those contained in the rankings may be kept for historical interest indefinitely over time, on the basis of criteria that can be consulted within the guidelines provided by the CODAU (Association formed by Italian University Rectors).

As the test will take place in streaming mode, the images and voices of the candidates will in no way be recorded, nor stored by the University and will not be disseminated in any way.

6. PROVISION AND REFUSAL OF PERSONAL DATA

The provision of personal data for the purposes referred to in point 3 of this information document is necessary to manage the activities described above related to the selection of students through the entry test. Failure to provide personal data will make it impossible to operate all the activities referred to in point 3 of this information.

7. RIGHTS OF THE DATA SUBJECTS

You shall be able to exercise your rights under articles 15, 16, 17, 18, 19 of EU Regulation 2016/679 by writing to the Data Controller, the Data processor or the Data Protection Officer at the following address: privacy@iulm.it. You shall have the right to obtain, at any moment, from the Controller, access to your personal data, and their rectification, you may request the cancellation of mere contact data. If you have registered for the test but did not show up, you can also request the cancellation of your personal data.

Without prejudice for any other administrative and jurisdictional recourse, if you believe that the processing of your personal data violates the provisions of EU Reg. 2016/679, you have the right, pursuant to art. 15 letter f) of said EU Reg. 2016/679, to lodge a complaint with the Data Protection Authority and, pursuant to art. 6 paragraph 1 letter a) and to art. 9 paragraph 2 letter a), to revoke your consent to the processing at any time.

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