

Pontifical University of St. Thomas Aquinas in Urbe, Rome
Largo Angelicum, 1 - 00184 Rome
C.F. 80121550588

INFORMATION ON THE PROCESSING OF PERSONAL DATA

Pursuant to Article 13 of EU Regulation 679/2016 (or *GDPR*).

The Pontifical University of St. Thomas Aquinas in Urbe values the protection of each person's data. This notice provides useful information to facilitate understanding of how personal and special data are handled. With reference to these data we inform you of the following:

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1. Owner and Data Processor¹ of personal data²

- The Data Controller for the processing of personal data is the Pontifical University of St. Thomas Aquinas in Urbe (henceforth also only "Data Controller" or "the Angelicum"), with headquarters in Rome, Largo Angelicum, 1 - 00184 Rome - C.F. 80121550588, website <https://angelicum.it>, in the person of its Rector *pro tempore*.

The contact details of the Holder are as follows:

Email: privacy@pust.it

Tel: +39 06 670 23 24

- The Person Responsible for the Protection of Personal Data (DPO): Studio Legale e Commerciale Montemarano - Via di Santa Costanza, 27 (RM) - lawyer in charge Paola Raponi contactable at the following email address: paola.raponi@studiomontemarano.it
- Angelicum staff are authorized to process personal data through individually drafted letters of appointment.

2. Place and legal basis for processing

Data processing is carried out and stored at the Controller's office.

The legal basis for processing is the contract concluded with you and regulatory compliance or the legitimate interest of the Data Controller.

If changes occur that affect processing whose legal basis is consent, the Controller will collect your consent, if necessary.

¹ "Processing" for the GDPR is *any operation or set of operations, whether or not by automated means, applied to personal data or sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, comparison or interconnection, restriction, erasure or destruction.*

² "Personal data" for the GDPR is *any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, by reference in particular to an identifier such as a name, an identification number, location data, an online identifier, or to one or more characteristic features of his or her physical, physiological, genetic, mental, economic, cultural, or social identity.*

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3. Source and type of personal data

Pursuant to Article 13 of EU Reg. 679/2016, the Angelicum processes the personal data of interested parties³ who have voluntarily communicated, in person and/or through forms, telephone, fax or email, their data to our offices.

In this regard, the types of personal data that we generally process are:

- a) COMMON DATA:
 - First and last name;
 - address or other personal identification (social security number, province of residence, gender);
 - e-mail address and phone number;
 - education and culture;
 - job (current occupation, resume);
 - Bank details for the purpose of paying tuition fees.
- b) special categories of Personal Data (*ex art. 9 GDPR*):
 - religious or philosophical beliefs;
 - Data likely to reveal racial or ethnic origin;
 - Any health data in the cover letters sent to us.

4. Purposes of personal data processing:

The Angelicum for its own institutional purposes, connected or instrumental to its activity, processes your data for the following purposes:

1. purposes related to regulatory and contractual obligations related to the provision of services offered, and related

- to the conclusion, management and execution of the academic and educational activities of the Angelicum;
- To the management of responses to its requests;
- to the administrative paperwork related to the Angelicum's offer and the conduct of its business, in order to enable the person concerned to benefit from personalized services and for the execution of the same;
- to the communication of notices and the sending of information related to academic and even extra-academic activities, when related to the educational activity;
- To the implementation of functional activities to ensure high standards of quality in teaching and forms of learning;
- to the fulfillment of legal, fiscal, and statutory obligations related to, or otherwise arising from, its enrollment at the Angelicum;
- To publication within the official documents of the Angelicum such as: Order of Studies, Inauguration of the Academic Year;
- to aspects of a publicity nature, in relation to the organization of charitable initiatives, conferences, seminars, study courses managed, or sponsored or otherwise sponsored or promoted, by the Angelicum;
- To the anonymous processing of statistics and research pertaining to academic and educational activity;
- to registering on the student management system and filling out the forms on the Angelicum website;
- To the entry of master records into computer databases;
- to historical-documentary archive activities, which includes theses and processed documents.

2. In addition, the Angelicum also carries out the following activities of Processing of your data, with respect to which you will be asked below for your consent, which constitutes the legal basis for such Processing:

- a) acquisition of video, audio and photographic footage or other audiovisual materials containing the image, name and voice of the person concerned related to academic activity, on the occasion of promotion of

³ "Data subject" is the natural person to whom the personal data refer.

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the activities and services offered by the Angelicum and events organized by it or "live" during the lecture itself for those enrolled in the course filmed or videotaped

(b) dissemination and reproduction of photos, audio and video through the following ways

- publication on the pages of <https://angelicum.it>;
- publication on the Angelicum's social pages such as FB, Twitter, YouTube, Instagram, Flickr and the like;
- Publication in print media such as banners, brochures, press releases, newspapers, etc.
- publication in any printed medium (banners, brochures, press releases, newspapers, etc.), digital (CD, DVD, hard disk, etc.) or analog (camera roll, whs, etc.);
- publication on any TV channel, streaming, on-demand, or in film;
- Publication on any multimedia, communication, data transmission channel, including so-called social networks, videographic and photographic content aggregator sites, Youtube channels or similar, chats and blogs;
- At official university channels of dissemination of training materials to students

It should be noted that the photo/video images produced during the event will be used by the Pontifical University of St. Thomas Aquinas in Urbe exclusively for the promotion of its activities and, in any case, on a non-profit basis. The aforementioned material will be used in full compliance with the regulations in force on the subject and with absolute respect for the honor, reputation and decorum of the person portrayed, in accordance with articles 97 L. 633/1941 and 10 of the Civil Code.

In accordance with Art. 98 L. 633/1941, the original images and videos (digital source files and/or film negatives) are understood to be the property of the Pontifical University of St. Thomas Aquinas in Urbe.

c) for aspects of an advertising nature, in connection with the organization of charitable initiatives, conferences, seminars, study courses managed, or sponsored or otherwise sponsored or promoted, by the Angelicum;

d) for purposes of university research activities and projects through the administration of anonymous questionnaires sent by e-mail.

5 Provision of data and consequences in case of failure to consent to processing

The provision of your data for the purposes set out in section 4.1 is necessary to enable the provision and management of the services: your refusal to provide such data will result in the impossibility of obtaining the services requested from the Controller.

With reference to the purposes of the processing referred to in Section 4.2, consent to the processing of data is optional and may be manifested through your explicit consent, for each distinct purpose, as indicated at the end of this notice.

Failure to consent will have no consequence on the possibility of receiving the requested services and, relatively:

in Section 4.2b will imply the inability to take part in the photo, audio, video and related publication in the manner described above;

in section 4.2c will imply the impossibility for the Angelicum to provide you with information and commercial promotions, such as the proposal of new initiatives, communication of new services, courses or events, through the implicit subscription to mailing lists owned by the Angelicum<

in section 4.2.c) the impossibility for the Angelicum to proceed with the performance of aggregate and anonymous statistics in order to monitor and improve the service offered.

6 Processing methods and security measures

The processing of personal data is carried out using both paper and computer media, observing all precautionary measures to ensure adequate data security and confidentiality.

The data will, moreover, be managed and protected in environments whose access is under constant control: in particular, all technical, IT, organizational, logistical and procedural security measures will be taken so that

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the appropriate level of data protection required by law is guaranteed, allowing access only to persons entrusted with the processing by the Data Controller or by His Data Processors, specially authorized by the Data Controller.

A list of security measures is available upon request at the Controller's office.

7. Transfer of data to third countries

The Data Controller does not transfer personal data to third countries; however, it reserves the option to use *cloud* services and, in that case, the service providers will be selected from among those who provide adequate guarantees, as provided by Article 46 GDPR 2016/679.

In addition, if there are special needs, such as those related to the transfer of data to non-EU countries, you will be given additional specific disclosures and asked for explicit consent in this regard.

8. Categories of recipients of personal data

Your data may be disclosed, solely for the above purposes, to the following categories of subjects:

- Angelicum internal staff, as appointees and/or processors;
- persons, companies, associations or professional firms that provide services or activities of assistance and advice in favor of the Angelicum, in order to protect their own right (for example: accountants, doctors, lawyers, tax consultants, auditors, consultants within the framework of auditing or due diligence operations, etc.);
- persons, companies, or agencies providing analytical services or consulting activities for the benefit of the Angelicum;
- Subjects to whom the right to access your data is recognized by provisions of law and secondary legislation or provisions issued by academic authorities empowered to do so by law;
- Subjects who request your data for the transmission of job offers;
- Companies that provide the Holder with services in the IT field (mail service providers, management software *et similia*).

An up-to-date list of the names of those to whom your data have been or may be disclosed is available from the Angelicum University secretariat.

9. Communication and dissemination of data

Your personal data will not be disseminated in any way.

The personal data of data subjects, if necessary, may be disclosed to:

- All persons to whom the right of access is granted by virtue of regulatory provisions;
- our collaborators, employees and suppliers, within the scope of their respective duties and/or any contractual obligations with them, inherent in their business relations with the data subjects;
- public and/or private entities, individuals and/or legal entities (legal, administrative and tax consulting firms, Judicial Offices, Chambers of Commerce, Municipality of Rome, etc.), in the event that the communication is necessary or functional for the performance of our activities and in the manner and for the purposes outlined above;
- banking institutions for the management of collections and payments arising from the execution of contracts;
- colleges to which the student's individual exam grades may be disclosed with prior consent.

In these cases, only data essential to the specific purposes will be disclosed.

10. Period of data retention

Personal data will be kept for the amount of time strictly necessary to pursue the specific purposes of the processing for which you have given your consent and, specifically:

- For the purposes stated in Section 4.1 with respect to storage/retention times, the following is specified:
- student records and career data are retained by the University indefinitely in time
- data pertaining to rankings or minutes are retained indefinitely in time, including for historical archives;
- the retention of the remaining data is subtended by the retention time of the administrative acts containing them for the time necessary for the fulfillment of contractual obligations and, in any case, not beyond the time limits set by law for the prescription of rights;

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- photos/images and audio/video footage taken at events and demonstrations, or processed within academic and educational activities, will be retained and processed for the sole purpose of documentation related to such activities and for the sole purpose of achieving the purposes for which the same were collected and subsequently processed;
- personal data will be retained for the duration of the performance of academic and training activities, and thereafter within the terms established by current regulations.
- For purpose 4.2 until consent is revoked.

If the application is not accepted or finalized, the data will be deleted within one year with the date of deletion noted.

Once the above retention periods have expired, the data will be destroyed or anonymized, consistent with the technical procedures for deletion and backup. Therefore, at the expiration of this period the right to access, deletion, rectification and the right to data portability can no longer be exercised.

11. Rights of the data subject

The interested party may, at any time, exercise the rights set forth below:

- a. **Withdraw consent** at any time. You may revoke your previously expressed consent to the processing of your personal data. Revocation of consent does not affect the lawfulness of the processing based on the consent before revocation.
- b. **Access to personal data:** to obtain confirmation or otherwise that data concerning you is being processed and, if so, access to the following information (including a copy of it): the purposes, categories of data, recipients, and retention period.
- c. **Request rectification:** may verify the correctness of their data and request updating and/or supplementation-correction, without undue delay.
- d. **Obtain deletion:** you can request the deletion, without undue delay, of your personal data from the Controller.
- e. **Obtaining restriction of processing:** if certain conditions, outlined below, are met, you may request restriction of the processing of your data. In this case, the Data Controller will not process the data for any purpose other than its preservation. The conditions provided for the exercise of the right are:
 - the data subject disputes the accuracy of the personal data, for the period necessary for the Data Controller to verify the accuracy of such personal data;
 - processing is unlawful and the data subject objects to the deletion of personal data and instead requests that their use be restricted;
 - although the Data Controller no longer needs it for the purposes of processing, the personal data is necessary for the data subject to establish, exercise or defend a right in court;
 - the data subject has objected to the processing pursuant to Article 21(1) of the GDPR, pending verification as to whether the data controller's legitimate grounds prevail over those of the data subject.
- f. **Object to processing:** you can object to the processing of your data when it is done on a legal basis other than consent. Further details on the right to object are provided in the section below.
- g. **Data portability:** in the case of automated processing carried out on the basis of consent or in performance of a contract, to receive in a structured, commonly used and machine-readable format the data concerning him/her; in particular, the data will be provided to you by the Data Controller in .xml, or similar format; in addition, you have the right to have your personal data transmitted directly to another Data Controller, without hindrance.
- h. **To lodge a complaint,** in accordance with Article 77 GDPR, with the competent supervisory authority based on your habitual residence, place of work or the place of violation of your rights; for Italy, the competent authority is the Garante per la protezione dei dati personali, which can be contacted through the contact details given on the website <http://www.garanteprivacy.it>.

Details of the right to object

When personal data are processed in the public interest, in the exercise of public authority vested in the Controller or in pursuit of a legitimate interest of the Controller, the data subject has the right to object to the processing on grounds relating to his or her particular situation.

Please note that if your data were processed for direct marketing purposes, including profiling, you may object to the processing without providing any reasons.

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The above rights may be exercised with a request to the Data Controller, at the contact details given in this notice. Requests relating to the exercise of the user's rights will be processed without undue delay and, in any case, within one month of the request; only in cases of particular complexity and the number of requests this deadline may be extended by an additional 2 (two) months.

The exercise of rights is free of charge in accordance with Article 12 GDPR; however, in the case of manifestly unfounded or excessive requests, including by reason of their repetitiveness, the Data Controller may charge the data subject a reasonable fee, in light of the administrative costs incurred in handling your request, or deny satisfaction of your request.

12. Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by informing the interested parties. Therefore, please consult this page regularly, referring to the date of last modification indicated at the bottom.

Ed 1 rev 0 of June 16, 2023

The undersigned _____, has received and understood the Angelicum's privacy policy.

Legible signature, for acknowledgement _____

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MANIFESTATION OF CONSENT OF THE PERSON CONCERNED

I, the undersigned _____, having acquired all the information provided by the Data Controller, hereby give my consent to the Processing of my personal data for the purposes indicated in the above statement and in particular I authorize the Angelicum to carry out the following processing:

- acquisition of video, audio and photo footage, or other audiovisual materials containing the image, name and voice of the interested party related to the academic activity, on the occasion of promotion of the activities and services offered by the Angelicum and events organized by it or live during the lecture itself for those enrolled in the course filmed or videotaped;

I authorize the processing	date	signature
Either you Or not		

- Dissemination and reproduction of photos, audio and video through the following modes:
 - publication on the pages of <https://angelicum.it>;

I authorize the processing	date	signature
Either you Or not		

- publication on the Angelicum's social pages such as FB, Twitter, YouTube, Instagram, Flickr and the like;

I authorize the processing	date	signature
Either you Or not		

- publication in any printed medium (banners, brochures, press releases, newspapers, etc.), digital (CD, DVD, hard disk, etc.) or analog (camera roll, whs, etc.);

I authorize the processing	date	signature
Either you Or not		

- publication on any TV channel, streaming, on-demand, or in film;

I authorize the processing	date	signature
Either you Or not		

- Publication on any multimedia, communication, data transmission channel, including so-called social networks, videographic and photographic content aggregator sites, Youtube channels or similar, chats and blogs;

I authorize the processing	date	signature
Either you Or not		

- At official university channels of dissemination of training materials to students

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I authorize the processing	date	signature
Either you Or not		

- for reasons of a publicity nature, in connection with the organization of charitable initiatives, conferences, seminars, study courses run, or sponsored or otherwise sponsored or promoted, by the Angelicum.

I authorize the processing	date	signature
Either you Or not		

- For purposes of university research activities and projects through the administration of anonymous questionnaires sent by email

I authorize the processing	date	signature
Either you Or not		