

PRIVACY POLICY STATEMENT (Rev. 2 of 14/04/2021)

Pursuant to and for the purposes of Article 13 of Legislative Decree 30 June 2003 No 196 and Articles 13-14 of EU Regulation 2016/679

[The official text is in Italian]

In compliance with the provisions of Legislative Decree No. 196 of June 30, 2003 (Code regarding the protection of personal data) and the EU Regulation 2016/679 (General Data Protection Regulation), we inform you that, for the execution of ongoing relationships, our Academy is in possession of your data qualified as "personal data".

Both Italian and European regulations require us to inform you about which data are processed and their treatment, which in any case must be done with fairness, lawfulness, transparency, protecting your privacy and your rights.

Therefore, in accordance with its provisions, we provide you with the following information:

Nature of data processed. We essentially process your common and sensitive data necessary for the pursuit of the Academy's institutional aims. We remind you that, pursuant to paragraph 1, point d) of art. 4 of Legislative Decree 196/2003, sensitive data are defined as personal data "*revealing racial or ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or organizations of a religious, philosophical, political or trade unionist character, as well as personal data disclosing health and sex life*".

Purposes of Treatment. Your data are processed for the pursuit of the institutional purposes of the Academy, which are those relating to the education and training of students as well as all administrative purposes instrumental to them as defined by current legislation (Royal Decree no. 653/1925; Legislative Decree no. 297/1994; Presidential Decree no. 275/1999; Law no. 104/1992; Law no. 53/2003; EU Regulation 2016/679 and subsequent amendments and additions). Your data, moreover, may be processed for exclusively internal purposes such as statistical indicators.

Duration of Treatment. Your data will be processed for as long as it is necessary for the Academy to carry out its administrative and commercial activities, and also after the completion of your studies in order to fulfill its legal obligations.

Modality of Treatment. The processing of data is done through the use of tools and procedures to ensure the security and confidentiality and can be done both by paper and through the use of electronic instruments, by persons specifically appointed for this purpose.

Treatment includes:

- The insertion or updating in our databases, both computerized and paper-based;
- The insertion and updating of the institutional website of the Academy: it is understood that access to the reserved area is allowed exclusively to the student through personal identification codes. The student is responsible for the safekeeping and confidentiality of the aforementioned codes; therefore, the loss or disclosure of these codes is not the responsibility of the Academy;
- The conservative storage of documents received;
- Processing by means of computers and computer networks;
- Manual processing using paper files.

Please be advised that each Academic Year a List of Students is published and distributed only to the Preside, Academy offices, and Faculty. This list contains:

- The names, nationality, diocese/institution of all students grouped by year and course of enrollment;
- Some statistical information on those enrolled;
- Seminaries, colleges, and boarding houses in Rome.

It is understood that by giving your consent to the data processing described in this Privacy Policy Statement, you explicitly consent to the publication of the data concerning you on this list, relieving Accademia Alfonsiana of all responsibility for any unauthorized use by third parties.

Scope of communication and diffusion. The treatment of the data happens in relation to the direct requirements of the intercurrent relationships and to the consequent fulfilments of the legal and fiscal obligations.

Your data, moreover, will be treated for exclusively internal purposes and will not be disclosed to unspecified subjects in any way, even through their provision or consultation.

Your information may be disclosed by us to one or more specified parties under the following terms:

1. To subjects in charge of processing your data within our Academy, within the limits of the exercise of their functions, and in particular: the academic authorities, the staff of the Offices and the Library, the teaching staff;
2. To subjects who can access the data by virtue of provisions of law, regulation or Community legislation, within the limits provided by these rules;
3. To subjects who need access to your data for purposes ancillary to the relationship between you and us, to the extent strictly necessary to carry out the ancillary tasks entrusted to them (banks, shippers, etc.);
4. To the EDACALF publishing house for the purpose of providing students with an updated service on editorial news (a service from which you may, if necessary, withdraw in response to the first email you receive);
5. To our consultants, to the extent necessary to carry out their duties at our Academy, subject to our letter of appointment that imposes a duty of confidentiality and security in the processing of your data;
6. To Student Representatives, to whom we will only provide personal data, including telephone number and e-mail address;
7. Representatives of institutions, including foreign ones, who make a written and reasoned request;
8. For everything concerning the academic career.

It is understood that by giving your consent to treatment, you explicitly consent to the diffusion of your data for the purposes indicated above and that you release Accademia Alfonsiana from any responsibility for any unauthorized use by third parties.

Your data will be stored at the Academy's offices or at the offices of external consultants as indicated above. The data will be processed for the period in which the student is regularly enrolled at this Academy and also after the completion of the course of study if the need arises.

Nature of the conferment. Without prejudice to your right to consent to the processing of your data, as regards those that we are obliged to know, in order to fulfill the obligations laid down by laws, regulations, Community legislation or provisions issued by competent authorities, any non-communication, or incorrect communication of any of the mandatory information, has as its consequences:

- The impossibility of perfecting the enrollment and the consequent impossibility of providing the student with all the services necessary to guarantee his or her right to education and training;
- The possible mismatch of the results of the processing itself with the obligations imposed by the fiscal, administrative, or labor regulations to which it is addressed.
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Your rights. You may assert your rights as enshrined in Articles 7,8,9,10 of Legislative Decree 196/2003 and Articles 15,16,17,18, 20 and 21 of EU Regulation 2016/679.

You have the right to obtain information about:

- The origin of personal data;
- The purposes and methods of processing;
- The logic applied in case of treatment with the aid of electronic instruments;
- The subjects or categories of subjects to whom the personal data may be communicated;
- The subjects or categories of subjects who may become aware of the personal data in their capacity as designated representatives in the territory of the State, managers or appointees;
- The identification details of the controller, the managers, and the designated representative.

You have the right to obtain:

- The updating, rectification, or integration of data;
- The cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those for which storage is not necessary in relation to the purposes for which the data were collected or subsequently processed;
- The transfer of your data to another Data Controller;

- The certification that the operations described above have been brought to the attention, also as regards their content, of those to whom the data have been communicated, except where this proves impossible or involves the use of means manifestly disproportionate to the protected right.

You have the right to object, in whole or in part:

- For legitimate reasons to the processing of personal data concerning you, even if pertinent to the purpose of collection;
- To the processing of personal data concerning you, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.

Controller of the Treatment and contact data. The Data Controller of your personal data is the Accademia Alfonsiana, CF 96437390584, P. IVA 15552691006, Largo Brancaccio 31, 00184 Roma, in the person of its Legal Representative, domiciled at the head office, who has designated a Data Coordinator (email: privacy@alfonsiana.org).

Any change in your data must be promptly communicated to the Academy's Secretarial Office so that we can always guarantee that the data collected is up-to-date and accurate.