

**Istituto per gli studi di politica Internazionale (International Political Studies Institute)**  
Palazzo Clerici, Via Clerici, 5  
20121 - Milano - MI

**Personal data processing notice (Privacy code - Legislative Decree no. 196/2003 as amended by Legislative Decree no 101/2018, EU regulation 679/2016 on personal data processing – Art. 13)**

**Istituto per gli Studi di Politica Internazionale** of Milan, Palazzo Clerici, Via Clerici 5 – 20121 Milan, tax code/VAT no. 02141980157 (hereafter referred to as the “**Data Controller**”), as data controller, hereby informs you under Legislative Decree no. 196/2003 as amended by **Legislative Decree no 101/2018** (hereafter referred to as the “**Privacy Code**”) and art. 13 of EU Regulation no. 2016/679 (hereafter the “**GDPR**”) that your data will be processed by the methods and for the purposes specified below:

### **1. Subject of Processing**

The Data Controller will process your personal data, including your particulars (such as name, surname, company name, address, telephone number, e-mail address, payment information, and academic background) – hereafter referred to as “personal data” or “data” – which you provided during the process of selection of candidates for our courses or upon signature of contracts for the Data Controller’s services. Processing of personal data refers to any operation or set of operations performed with or without the aid of automated processes and applied to personal data or sets of personal data, even if not registered in a database, such as collection, registration, organisation, structuring, conservation, processing, selection, blocking, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, erasure or destruction.

### **2. Purposes of processing**

Your personal data will be processed:

A) without your express consent (section 6, letters b) and e) of the GDPR), for the following Service Purposes:

- conclusion of contracts for the Data Controller’s services;
- fulfilment of pre-contractual, contractual and fiscal obligations arising from our relations with you;
- fulfilment of obligations under the law, regulations, EU regulations or the orders of authorities
- exercise of the Data Controller’s rights, such as the right to defence in court

For fulfilment of the above purposes, and specifically the supply of the services promoted by the Data Controller, such as, in this case, participation in our courses, we ask you to supply your C.V. so that we can determine whether you meet the academic requirements for participation to our courses.

B) with your express written consent (art.130 of the Privacy Code and art. 7 of the GDPR), conducting direct marketing initiatives such as sending - possibly by e-mail, text message and MMS - of advertising materials and announcements containing information and/or promotional material regarding products or services supplied and/or promoted by the Data Controller and its business partners;

If you are already our customer, we may send you commercial information on services and products provided by the Data Controller similar to those you already use, unless you object (art. 130, point 4 of the Privacy Code).

### **3. Methods of processing**

Your personal data will be processed through the operations identified in art. 4, point 2) of the GDPR, and specifically: collection, registration, organisation, conservation, consultation, processing, modification, selection, extraction, comparison, use, interconnection, freezing, communication, erasure and destruction of data. Your personal data will be processed in both printed and electronic and/or automated form.

The Data Controller will process your personal data for the amount of time necessary to fulfil the purposes specified above, and in no case for more than 10 years following the cessation of the relationship for Service Purposes and for no more than 2 years following the collection of the data for Marketing Purposes.

Regarding your candidacy and your C.V., which the Data Controller may receive, by post, e-mail, direct delivery, web form, or any other means of communication, with your written consent, we may conserve your data for longer than is ordinarily allowed, that is, for 60 months instead of the legal term of 12 months, so that you may be contacted again at a later time to invite you to participate in other courses for which you already possess the requirements. In the registration procedure for courses on our premises or with the dedicated format present on our internet site, if your candidacy should be of interest to the Data Controller, the office in charge of assessing candidacies will, at the time of first contact with the data subject, provide a privacy notice and obtain the data subject’s consent for data processing for the purposes described above (if not already acquired online). If this is not done, the Curriculum presented will be destroyed immediately.

The maximum storage time for candidacies and CVs of interest to the Institute is 60 months (or 12 months if consent is not given) from the date on which they are received. Following the expiration of this time period, candidacies and curricula will be destroyed.

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#### **4. Access to data**

Your data may be made accessible for the purposes described in art. 2.A), and, with your consent, 2.B):

- to the Data Controller's employees and collaborators, as persons in charge of the processing and/or internal data processors and/or system administrators;
- to third-party companies or other parties providing services outsourced by the Data Controller (such as, by way of example, financial institutions, professional studios, consultants, business partners, insurance companies for the providing of insurance services, etc.), in their capacity as external data processors.

#### **5. Communication of the data**

With no need for express consent (art. 6, letters b) and c) of the GDPR), the Data Controller may communicate your data for the purposes specified in section 2.A) to supervisory bodies, judicial authorities, insurance companies for the purposes of providing insurance services, and to those parties to whom the data must obligatorily be provided by law for the specified purposes. These parties will process the data as independent data controllers.

Data conferral is optional, and it is up to candidates to decide whether to submit their curriculum vitae. For the purposes of the selection procedure and any other data that may subsequently be requested by the Data Controller, failure to confer your data will make it impossible to proceed with verification of whether the requirements have been met for participation in the selection procedure for admission to the course.

Your data will not be disseminated.

#### **6. Data transfer**

Your personal data will be stored on a server located in the European Union. It is in any case understood that the Data Controller may, if it should become necessary, have the option of moving servers outside the European Union. In this case, the Data Controller hereby guarantees that transfer of the data outside of the European Union will take place in compliance with the applicable provisions of the law, following stipulation of the standard contractual clauses required by the European Commission.

#### **7. Nature of data conferral and consequences of refusal to respond**

Please note that, with reference to the purposes identified in point 2 A of the section on "Purposes of processing", in the absence of your personal data and your consent for the processing thereof, with the exception of those cases in which Legislative Decree 196/03 and EU Regulation 2016/679 permit subsequent consent, the service may not be provided. Failure to confer your data for the purposes identified in point 2B of the section on "Purposes of processing", on the other hand, shall not affect the providing of services.

Personal data collected from your C.V. shall include only ordinary data, including the photograph provided with the C.V., and so the candidate shall not be required to provide particular data, as defined in section 9 of Reg. 2016/679, or sensitive data, as defined in Legislative Decree 196/2003. The exception is the case in which the data in question must be known for the purposes of participation to the course, with specific reference to particular disabilities involving use of a wheelchair, in order to ensure easier access to the classrooms where the course will be held.

#### **8. Data subject's rights**

As data subject, you enjoy the rights identified in art. 15 of the GDPR, and specifically:

- the right to obtain confirmation as to whether or not personal data concerning you exist, regardless of their being already recorded, and communication of such data in intelligible form;
- the right to be informed: a) of the source of the personal data; b) of the purposes and methods of the processing; c) of the logic applied to the processing, if the latter is carried out with the help of electronic means; d) of the identification data concerning the data controller, data processors and the representative designated as per art. 3, paragraph 1 of the GDPR; e) of the entities or categories of entity to whom or which the personal data may be communicated and who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing;
- the right to obtain: a) updating, rectification or, where interested therein, integration of the data; b) erasure, anonymisation or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed; c) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected;
- the right to object, in whole or in part: a) on legitimate grounds, to the processing of personal data concerning you, even though they are relevant to the purpose of the collection; b) to the processing of personal data concerning him/her, where it is carried out for the purpose of sending

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advertising materials or direct selling or else for the performance of market or commercial communication surveys, using automated calling systems without the action of an operator, by e-mail and/or using traditional telephone and/or print mailing marketing methods. Note that the data subject's right to object, described in point b) above, to the use of personal data for direct marketing purposes using automated methods also extends to traditional methods and that the data subject may exercise the right to object in whole or in part. The data subject may therefore decide to receive only communications sent by traditional methods or only automated communications, or neither of the two types of communication.

Where applicable, the data subject shall also have the rights guaranteed under sections 16-21 of the GDPR (right to correction, right to be forgotten, right to limitation of processing, right to data portability, right objection), and the right to present a complaint to the competent authority, the Autorità Garante.

**9. How data subjects may exercise their rights**

Data subjects may exercise their rights at any time by sending:

a letter by registered mail with return receipt to **Istituto per gli Studi di Politica Internazionale** of Milan at the address Palazzo Clerici, Via Clerici 5 – 20121 Milan, or by sending an e-mail to [privacy@ispionline.it](mailto:privacy@ispionline.it)

**10. Data Controller and DPO Data Protection Officer**

**Istituto per gli Studi di Politica Internazionale** of Milan, Palazzo Clerici, Via Clerici 5 – 20121, Milan. An updated list of data processors and persons in charge of the processing is kept in the Data Controller's registered offices.

Data Protection Officer's contact details are the following: Dott. Cristian Pacelli, e-mail [privacy@ispionline.it](mailto:privacy@ispionline.it) writing to which you can exercise the rights contemplated by the section 15 of the Regulation

**Consent for personal data processing**

Having read this notice, I, the undersigned \_\_\_\_\_ residing at \_\_\_\_\_ hereby declare that I have understood the content of the notice and consent to the processing of my personal data for the purposes of the service in subject.

I, the undersigned, also declare that I specifically consent in writing to processing of my data for the following additional purposes:

1) conducting direct marketing activities such as sending - also by e-mail, text message and MMS - of advertising materials and announcements containing information and/or promotional material regarding products or services supplied and/or promoted by the Data Controller and its business partners

I consent    I do not consent

2) I specifically consent to storage of my candidacy, curriculum and record of assessment for 60 months in order to permit the possible sending of subsequent proposals for participation in other courses. Withholding consent to storage of your data for 60 months will have no impact on the results of the selection, but data storage time will be reduced to 12 months.

I consent    I do not consent

Date .....

Signature.....