



E-LEARNING LUMSA - PRIVACY AND COOKIE POLICY Information notice pursuant to Article 13 of Regulation (EU) 2016/679 (GDPR)



WHY THIS INFORMATION

Pursuant to Regulation (EU) 2016/679 (hereinafter "GDPR"), this page describes how we process personal data. This information is provided pursuant to art. 13 GDPR. The information does not apply to other third party websites that may be consulted through links on this website, for which no responsibility is assumed.

Personal data that can be processed

Personal data: means 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, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Navigation data

The computer systems and software procedures used to operate this site acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This category of data includes IP addresses or domain names of computers and terminals used by users, URI/URL (Uniform Resource Identifier/Locator) of requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response from the server (successful, error, etc.) and other parameters regarding the operating system and computer environment.

Data communicated voluntarily

The optional, explicit and voluntary sending of messages to the contact addresses indicated on this site and/or the filling in of data collection forms entails the subsequent acquisition of the sender's address, necessary in order to respond to requests, as well as any other personal data entered.

Information about the processing of personal data carried out through Social Media platforms

Regarding the processing of personal data carried out by the owners of social media platforms used by the Data Controller, please refer to the information provided by them through their respective privacy policies. The Data Controller processes the personal data provided by users through the pages of the dedicated Social Media platforms, to manage interactions with users (comments, public posts, etc.) and in compliance with current legislation.

Specific information notices

Specific information notices may be present in the pages of the Site in relation to particular services or processing of data provided.

COOKIES AND OTHER TRACKING SYSTEMS What are they? What are they used for?

This site does not use profiling cookies, either for statistical purposes or for advertising targeting.

Only technical cookies are used for the fruition of the site itself.

Temporary session cookies are used to improve navigation by adapting the operation of the website to the type of device used (computer, cell phone, tablet, etc.). For further information, please refer to www.youronlinechoices.eu.



1. WHO IS THE DATA CONTROLLER? HOW TO CONTACT HIM?

The data controller, pursuant to Articles 4 and 24 of EU Reg. 2016/679, is LUMSA Libera Università Maria Ss. Assunta, with registered office in via della Traspontina, 21 - 00193 Rome (Italy), in the person of the special attorney. Contact information of the data controller: privacy@lumsa.it.







2. HAS THE DATA PROTECTION OFFICER BEEN APPOINTED? WHAT ARE HIS CONTACT DETAILS?





The Society has also appointed a Data Protection Officer (RPD/DPO) pursuant to articles 37 - 39 of EU Reg. 2016/679 whose contact details are given below: email dpo.lumsa@dpoprofessionalservice.it.







3. PURPOSE OF THE PROCESSING, LEGAL BASIS, DATA RETENTION AND NATURE OF THE PROVISION

 PURPOSE OF THE PROCESSING	 LEGAL BASIS	 DATA RETENTION	 NATURE OF THE PROVISION
<p>Allowing navigation on this website (https://elearning.lumsa.it/), use of cookies and similar technologies, strictly necessary to allow the proper functioning of the e-learning platform.</p> <p>The data necessary for the use of web services, are also processed in order to:</p> <ul style="list-style-type: none"> - obtain statistical information on the use of services (most visited pages, number of visitors per time slot or daily, geographical areas of origin, etc.); - to check the correct functioning of the services offered. <p>The data will also be used to determine responsibility in case of computer crimes against the site.</p>	<p>The processing is necessary for the purposes of pursuing the legitimate interests of the data controller or a third party, as long as the interests or fundamental rights and freedoms of the data subject that require the protection of personal data do not prevail, having considered the reasonable expectations held by the data subject and the activities strictly necessary for the operation of the website and the navigation itself (Art. 6, par. 1 lett. f and C47 of the GDPR).</p> <p>The data subject has the possibility to obtain, upon request, information about the balancing test performed.</p>	<p>The retention of browsing data will last until the end of the browsing session. In case of need to ascertain crimes by the judicial authorities, the information collected on the servers will be kept for a maximum of 7 days.</p>	<p>The provision of data is necessary for navigation on the website.</p>





In addition to navigation, personal data will be processed for:

 PURPOSE OF THE PROCESSING	 LEGAL BASIS	 DATA RETENTION	 NATURE OF THE PROVISION
<p>A) Allow access by teachers and enrolled students to the reserved area of the e-learning platform.</p> <p>Through the platform, LUMSA provides several services, including the possibility to exchange messages with other users and to enroll in courses (by entering the required key).</p>	<p>The processing is necessary for the performance of a contract to which the data subject is party or the implementation of pre-contractual measures taken at the request of the same - C44 and art. 6 par. 1 lett. b) of the GDPR.</p>	<p>Until the expiration of the contract and the corresponding account.</p> <p>In any case, users are always free to request cancellation of the account.</p>	<p>The provision of data is mandatory.</p> <p>Failure to provide the necessary data will make it impossible to access the reserved area and to use the services offered by the University.</p>



 PURPOSE OF THE PROCESSING	 LEGAL BASIS	 DATA RETENTION	 NATURE OF THE PROVISION
<p>B) Allow access, through the creation of a temporary account, to pre-enrolled students from other universities, who do not have a lumsastud.it account yet.</p> <p>Through the platform, LUMSA makes various services available, including the possibility of exchanging messages with other users and enrolling in courses (by inserting the required key).</p>	<p>The processing is necessary for the performance of a contract to which the data subject is party or the implementation of pre-contractual measures taken at the request of the same - C44 and art. 6 par. 1 lett. b) of the GDPR.</p>	<p>Starting from the second academic year, the temporary account created will be cancelled and users will be able to access only with their LUMSA credentials.</p> <p>In any case, users are always free to request cancellation of the account.</p>	<p>The provision of data is mandatory.</p> <p>Failure to provide the necessary data will make it impossible to access the reserved area and to use the services offered by the University.</p>
<p>C) Internal management of the e-learning platform, technical, administrative and secretarial purposes, including the sending of service communications related to the account and the services offered through the platform.</p>	<p>The processing is necessary for the purposes of pursuing the legitimate interests of the data controller or a third party, as long as the interests or fundamental rights and freedoms of the data subject that require the protection of personal data do not prevail, having considered the reasonable expectations held by the data subject and the activities strictly necessary for the operation of the website and the navigation itself (Art. 6, par. 1 lett. f and C47 of the GDPR).</p> <p>The data subject has the possibility to obtain, upon request, information about the balancing test performed.</p>	<p>Data collected for general internal management purposes follow the terms provided for other specific purposes.</p>	<p>The provision of data is mandatory.</p> <p>Failure to provide the necessary data will result in the inability to take advantage of the services offered by the University.</p>
<p>D) Verification of account security. Interested parties, once logged into their reserved area, may view access information (date, time and approximate geographic location based on IP address) to verify any suspicious logins to their e-learning account.</p>	<p>The processing is necessary for the purposes of pursuing the legitimate interests of the data controller or a third party, as long as the interests or fundamental rights and freedoms of the data subject that require the protection of personal data do not prevail, having considered the reasonable expectations held by the data subject and the activities strictly necessary for the operation of the website and the navigation itself</p>	<p>Until the expiration of the contract and the corresponding account (definitive or temporary).</p> <p>In any case, users are always free to request cancellation of the account.</p>	<p>The provision of data is mandatory for security purposes.</p> <p>Failure to provide the necessary data will result in the inability to access the restricted area and use the services offered by the University.</p>



 PURPOSE OF THE PROCESSING	 LEGAL BASIS	 DATA RETENTION	 NATURE OF THE PROVISION
	(Art. 6, par. 1 lett. f and C47 of the GDPR). The data subject has the possibility to obtain, upon request, information about the balancing test performed.		
E) Provide feedback in case of contact or information requests, related to the services offered through the e-learning platform.	The processing is necessary for the performance of a contract to which the data subject is party or the implementation of pre-contractual measures taken at the request of the same - C44 and art. 6 par. 1 lett. b) of the GDPR.	For the time necessary to provide feedback to the request and in any case no longer than 1 year.	The conferment is mandatory. Failure to provide the necessary data will make it impossible to be contacted and receive information.
F) Manage requests from interested parties, pursuant to Art. 15 et seq. of the GDPR (rights of the interested party).	The processing is necessary to comply with a legal obligation to which the data controller is subject - C45 and Art. 6 para. 1(c) of the GDPR.	5 years from the closing of the application, subject to litigation.	The provision of personal data is mandatory, as it is essential to be able to implement the obligations of the law.



4. TO WHOM THE PERSONAL DATA WILL BE COMMUNICATED? RECIPIENTS OF DATA?

Personal data will be communicated, depending also on the purposes under specific areas, to subjects who will process the data as autonomous Data Controllers or Data Processors (art. 28 GDPR) and processed by individuals (art. 29 GDPR) acting under the authority of the Data Controller and Processors on the basis of specific instructions provided, regarding the purposes and methods of processing, for specific purposes according to the area involved.

The data will be communicated to recipients belonging to the following categories:

- Subjects based in Italy, who provide services for the management of the e-learning platform of the University;
- Subjects based in Italy, which provide services related to communication networks, including e-mail, host and website management;
- Freelancers, firms or companies based in Italy, as part of assistance and consultancy relationships;
- Subjects based in Italy who provide services for the management of the activities indicated above in the purposes;
- Competent authorities for the fulfilment of legal obligations and/or provisions of public bodies, upon request.

The list of Data Processors is available by writing to privacy@lumsa.it or to the other addresses indicated above.



5. WILL THE DATA BE TRANSFERRED TO NOT-EEA COUNTRIES?

Please note that the data will be stored in Italy for hosting services, management, development and maintenance of the site. All third parties to whom the data may be communicated are based in Italy.



The transfer of data outside the European Economic Area (EEA) will take place only in the case of filling out the Google Form for the purpose B) of the information notice. The chosen supplier has data centers also located outside the EEA. The Data Controller has therefore assessed the conditions underlying the transfer of data and the relative guarantees, through the analysis of contracts and information such as security certifications provided by the provider of the service in question.

Below are useful links to Google's data processing policy for further information:

- Main Policy: <https://policies.google.com/privacy/update>

- List of Google data center locations: <https://www.google.com/about/datacenters/inside/locations/index.html>

You are free to request further information by contacting the data controller at privacy@lumsa.it.



6. IS THERE AN AUTOMATED PROCESS?

Personal data will be processed manually in traditional, electronic and automated ways. Please note that no fully automated decision-making processes are carried out.



7. WHAT ARE YOUR RIGHTS? HOW CAN YOU EXERCISE THEM?

You may exercise your rights as expressed by the EU Regulation 2016/679 at art. 15 et seq. by contacting the Data Controller by writing to privacy@lumsa.it or the Data Protection Officer ex art. 38 paragraph 4, by writing to the email address dpo.lumsa@dpoprofessionalservice.it or the PEC address dpo.lumsa@pec.dpoprofessionalservice.it.

You have the right, at any time, to request access to your personal data (art.15), rectification (art.16), cancellation (art.17), limitation of processing (art.18). The data controller communicates (art.19) to each of the recipients to whom the personal data have been transmitted any rectification or cancellation or limitation of processing carried out. The data controller shall inform the data subject of such recipients if the data subject so requests. In the cases provided for, you have the right to the portability of your data (art.20) and in this case you will be provided in a structured format, commonly used and readable, by automatic device. You have the right to object (art.21), at any time, to the processing of data based on legitimate interest, and in cases where the legal basis is consent, you have the right to withdraw the consent given without affecting the lawfulness of the processing based on the consent before the withdrawal.

In the event that the data subject considers that the processing of personal data carried out by the Controller is in violation of the provisions of Regulation (EU) 2016/679, he/she has the right to lodge a complaint to the Data Protection Authority, in particular in the Member State in which he/she normally resides or works or in the place where the alleged violation of the Regulation has occurred (Garante Privacy <https://www.garanteprivacy.it/>), or to take appropriate legal action.



8. CHANGES TO THE POLICY

The Data Controller reserves the right to modify, update, add or remove parts of this policy. In order to facilitate verification and modification of the text, the notice will contain the date of update.

Date of update: March 29, 2022