



LUMSA
UNIVERSITÀ

Information for the processing of personal data

For fundraising activities carried out by the University through a specific platform

Information document pursuant to and for the purposes of Article 13 of EU Reg. 2016/679

In compliance with EU Regulation 2016/679, General Data Protection Regulation ("RGPD" or "GDPR" in English) and subsequent amendments, data subjects are provided with the necessary information regarding the processing of the personal data provided by them. This information is provided pursuant to art. 13 of EU Reg. 2016/679.

DATA CONTROLLER, pursuant to articles. 4 and 24 of EU Reg. 2016/679 is LUMSA Libera Università Maria Ss. Assunta, with headquarters in via della Traspontina, 21 – Rome, in the person of the special prosecutor.

Data controller contact details: privacy@lumsa.it

Preliminarily, it is stated that all the activities carried out by the data controller as a University (regardless of the specific nature and legal form assumed) are part of the pursuit of objectives of public interest (see art. 1, paragraph 1, of law no. 240 of 2010, referring to both state universities and non-state universities), a purpose which consists in the promotion of study and culture in general, through free teaching (see articles 33 of the Constitution and 1 of the aforementioned law of 30 December 2010, n. 240), education and training in a school, professional, high school or university setting.

Given the above, the processing of personal data reported in the tables below, as well as the related purposes pursued, can be traced back to the "execution of a task of public interest or connected to the exercise of public powers" (art. 6, par. 1, letter e), and, with regard to special categories of data, art. 9, letter. g), of EU Reg. 2016/679).

DATA PROTECTION OFFICER (RPD/DPO) The University has also appointed the Data Protection Officer ("RPD" or "DPO" in English) pursuant to articles. 37 - 39 of EU Reg. 2016/679, the contact details of which are given below: email dpo.lumsa@dpoprofessionalservice.it.

TYPE OF DATA PROCESSED

Definitions:

- **Personal data**: any information relating to an interested party, with particular reference to an identifier such as the name, an identification number, location data, an online identifier or to one or more characteristic elements of his physical, physiological, genetic, mental identity, economic, cultural or social - see art. 4, par. 1, no. 1, EU Reg. 2016/679.
- **Special data categories**, e.g. "racial and ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, biometric or health-related data" - see art. 9, par. 1, EU Reg. 2016/679.
- **Categories of data relating to criminal convictions and crimes** - see art. 10 EU Reg. 2016/679.

In particular, for the specific purposes set out below, the following data will be collected and processed:

Personal data:

- **Surname name**
- **Address**



- **Email**
- **IBAN (for regular donors)**
- **IP address used for the transaction**
- **Financial data (depending on the means of payment), credit card, expiry date, RUM (unique mandate reference), donation amount, payment method, transaction reference**
- **Beneficiary organization**

Data subjects are informed, pursuant to EU Regulation 2016/679, that the personal data acquired by the Data Controller in compliance with the legislative and contractual provisions in force will be processed in compliance with the aforementioned legislation and confidentiality obligations.

Processing of personal data means: "any operation or set of operations, carried out with or without the aid of automated processes and applied to personal data or set of personal data, such as collection, recording, organisation, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, deletion or the destruction".

By interested party we mean: "identified or identifiable natural person" i.e. subjects who wish to make donations and participate in fundraising initiatives organized by the University.

	<i>Purpose of the processing</i>	<i>Legal basis of the treatment</i>	<i>Data retention period</i>	<i>Nature of provision and refusal</i>
A)	Management of fundraising initiatives, using a specific online payment collection platform.	Article 6 par. 1 letter b) GDPR. Execution of pre-contractual and contractual measures related to the donation request.	The personal data collected will be kept for 10 years or for the necessary time required by law in relation to non-contractual and contractual issues that may arise.	The provision of data is necessary to allow data subjects to make the donation. In case of failure to provide data, data subjects will not be able to participate in the fundraising.

RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE DATA

The personal data will be communicated to subjects who will process the data as independent data controllers, or data processors (art. 28 GDPR) and processed by natural persons (art. 29 GDPR) acting under the authority of the Data Controller and the Data Processor on the basis of specific instructions provided regarding the purposes and methods of processing.

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

- University structures for administrative/institutional purposes or for compliance with legislative obligations;
- External parties, located in Italy, who manage / support / assist, even occasionally, the Data Controller in the administration of the information system and telecommunications networks (including email);
- External entities, located in Europe, who provide the platform used for fundraising and its hosting;
- Competent authorities for the fulfillment of legal obligations and/or provisions dictated by public bodies.

The list of data controllers art. 28 is available by writing to privacy@lumsa.it or to the other contact details indicated above.



DATA TRANSFER TO A THIRD COUNTRY AND/OR AN INTERNATIONAL ORGANIZATION

Personal data will not be transferred to countries located outside the European Economic Area. It should be noted, in particular, that the servers connected to the fundraising platform are located in Ireland and Germany.

In any case, data subjects are free to request further information on the transfers made and the related guarantees, pursuant to articles. 44 et seq. of the GDPR, by contacting the data controller at privacy@lumsa.it.

AUTOMATED PROCESSES

Personal data will be subjected to traditional manual, electronic and automated processing. Please note that fully automated decision-making processes are not carried out.

RIGHTS OF DATA SUBJECTS

Data subjects will be able to assert their rights as expressed by EU Regulation 2016/679 in art. 15 et seq. by contacting the Data Controller by writing to privacy@lumsa.it or the Data Protection Officer | Data Protection Officer pursuant to art. 38 paragraph 4, by writing to the email address dpo.lumsa@dpoprofessionalservice.it or to the PEC address dpo.lumsa@pec.dpoprofessionalservice.it.

The data controller guarantees data subjects the possibility to request, at any time, access to their personal data (art.15), rectification (art.16), cancellation of the same (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 corrections or cancellations or limitations of processing carried out. The data controller communicates to data subjects who request such recipients.

The data controller guarantees the right to portability (art.20) and, in the event of requests pursuant to art.20, will provide data subjects with the data in a structured, commonly used and machine-readable format.

In the event that data subjects believe that the processing of personal data carried out by the Data Controller occurs in violation of the provisions of Regulation (EU) 2016/679, they are free to lodge a complaint with the national supervisory authority, in particular in the Member State in question. where they habitually reside or work, or in the place where the alleged violation of the Regulation occurred (Privacy Guarantor <https://www.garanteprivacy.it/>), or to take action in the appropriate judicial offices.

CHANGE IN PRIVACY POLICY

The data controller reserves the right to modify, update, add or remove parts of this privacy policy at its discretion and at any time. In order to facilitate this verification, the information will contain an indication of the update date.

Update date: April 16, 2024

THE DATA CONTROLLER - STAMP AND SIGNATURE