

SUMMARY PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA - AMA ASSOCIATION

Pursuant to Article 13 of the EU Regulation 2016/679 - General Data Protection Regulation - **Associazione Almae Matris Alumni** (hereinafter, also "Association") of the Alma Mater Studiorum Università di Bologna, in its capacity as Controller of your personal data, provides you with the necessary information regarding the purposes and methods of data processing, the scope of communication and disclosure of such data, and the nature of their provision. This Privacy Policy is addressed both to registered users of the Association and registered to the Alumni portal (hereinafter also referred to as "Members" or "Alumni") and to any visitors to the website www.alumni-association.unibo.it ("Visitors"), but it does not extend to processing performed by third parties in relation to data shared, communicated, disclosed or transmitted by the user through external links present on the website www.alumni.unibo.it; with respect to said further processing, the user is required to consult the information specifically prepared by the parties that perform them.

We therefore provide you with the following information:

1. IDENTITY AND CONTACT DETAILS OF THE CONTROLLER

The Controller is the Associazione Almae Matris Alumni with registered office in Bologna, Via Zamboni 33, e-mail: alumni@unibo.it

2. CONTACT DETAILS OF THE ADMINISTRATIVE CONTACT PERSON

The contact person for data protection issues can be contacted at the following e-mail address: alumni.privacy@unibo.it

3. PURPOSE OF THE PROCESSING

The data and images you provide when filling in the Association's registration form online at www.alumni.unibo.it as well as the sharing, communication and disclosure on the Alumni Portal, sent by e-mail, or otherwise communicated or transmitted while browsing the portal or on the website <https://site.unibo.it/alumni-association/it> when taking part in initiatives and events shall be processed by the Association, within the limits provided for by law, for the following purposes:

- a) to foster the development of the Association and its activities in the realisation of its institutional purposes as set out in Article 2.3 of the Association's Articles of Association;
- b) to implement an Alumni active engagement system that takes the form of collaboration in and support of the mission and the achievement of the University's strategic objectives, encouraging the involvement of alumni in the implementation of joint initiatives aimed at: supporting the academic and professional growth of students and alumni, further enhancing the national and international reputation, attractiveness in terms of students, resources, creation of research and professional networks and increasing the potential for interaction with the University territory;
- c) to enhance, nationally and internationally, the name and image of the University and its graduates, through the establishment of alumni association chapters spread throughout Italy and abroad;
- d) to facilitate fundraising to finance the running costs of the Association;
- e) to actively involve the Association in the University's fundraising campaigns to promote their success;
- f) to implement any other initiative in line with the purposes set out in this agreement as well as the statutory purposes of the Parties.

4. LEGAL BASIS OF THE PROCESSING

Your data will only be processed with your express consent.

The data you provide will also be processed where necessary to fulfil a legal obligation to which the controller is subject.

5. CONTROLLERS, JOINT CONTROLLERS AND DATA PROCESSORS

In relation to personal data processing activities, considering that the institutional purposes and activities of the Association are defined jointly with the Alma Mater Studiorum Università di Bologna, the responsibilities for data processing are represented below.

The Association and the University of Bologna jointly establish the purposes and means of the processing of personal data in accordance with Article 26 of Regulation (EU) 2016/679 and are therefore **Joint Controllers** in the context of activities carried out for the purpose of:

- a) implementing guidelines and activities agreed jointly for the achievement of common goals and objectives, also jointly defining the means;
- b) disseminating the tradition and culture developed by the University;
- c) creating and supporting relationships between the University and private and public organisations, both Italian and foreign, that can foster areas of collaboration;
- d) promoting the cultural and professional growth of members with initiatives to enhance the reputation and attractiveness of the University's people and resources;
- e) promoting fundraising projects, also in cooperation with public and private entities, aimed at supporting initiatives and projects of the University;
- f) managing the digital platform for registering members of the Association and collecting any membership fees
- g) managing joint Association/ University initiatives and events, in particular, guidance and placement, career service, entrepreneurship, lifelong learning, networking, public engagement and fundraising initiatives of the University and ceremonies involving alumni, as well as for other initiatives with an impact on alumni and society carried out by the University in order to contribute to job placement, career development, networking of students and graduates and the academic community

The Association is an **autonomous Controller** when the activities are aimed at:

- a) promoting the communication of events/initiatives on its channels that may be of interest to alumni;
- b) developing and implementing its own activities, both nationally and internationally, by organising its own initiatives and the establishment of alumni groups, to foster interaction and professional networking among alumni and the continuous development of opportunities for discussion and exchange of experiences;
- c) promoting the link between the University and its Alumni, strengthening students' and graduates' sense of belonging to their University also by offering benefits and discounts;
- d) creating a network among Alumni capable of maintaining and promoting the values of the University in every sphere and place;
- e) encouraging donations and other material and immaterial contributions from among the Association's network.

6. RECIPIENTS AND CATEGORIES OF RECIPIENTS OF PERSONAL DATA

The data processed by the Association will not be disclosed to third parties, except in the cases provided for in this privacy policy and/or by law and, in any case, in the manner permitted by the latter.

The members' data, for the pursuit of the institutional purposes as set out in the Articles of Association of the Association at Article 2, points 2.3 lett. f) and lett. i), point 2.6 lett. g), will be disclosed to the Alma Mater Studiorum Università di Bologna, promoting and founding member of the Association, for the pursuit of the common institutional purposes as set out in the respective Articles of Association and for the realisation of joint initiatives.

The data may also be disclosed to parties formally designated by the Association (Fondazione Alma Mater for accounting-administrative services for the Association, collaborators, external consultants, suppliers of IT and event organisation services, etc.) as data processors or persons in charge of data processing, within the scope of their respective functions and in accordance with the instructions received, solely for the achievement of the specific purposes and methods set out in this privacy policy. The list of the persons designated as external data processors can be requested by email from: alumni.privacy@unibo.it

The personal data provided may be disclosed to third parties in order to fulfil legal obligations, to comply with orders from relevant public authorities, or to assert or defend a right in court. The Association will in such cases take all necessary measures to require third parties to comply with privacy regulations.

7. PROVISION OF DATA

The provision of data for the purposes described in art. 3 letter a) is mandatory and any refusal by the User precludes membership of the Associazione Almae Matris Alumni of the Alma Mater Studiorum Università di Bologna.

Consent is optional for personal data as provided for in art. 3 letter b) and in relation to news and information also of a promotional nature concerning content (publications, meetings, events, etc.) referable to subjects other than the Association or the Alma Mater Studiorum Università di Bologna, in any case pertaining to the purposes of the Association itself.

8. DATA RETENTION PERIOD

The retention period of your personal data complies with the principle of necessity of processing. Your personal data will therefore be kept for as long as is necessary for the fulfilment of the purposes stated in section 3 and no longer than the duration of your membership of the Association. Traffic data (e.g. time and duration of connection) are deleted or anonymised when they are no longer required for the transmission of the communication unless otherwise provided by law (maximum 12 months).

9. DATA TRANSFER

The Association uses servers where members' personal data are stored digitally at:

- a) the registered office of the Alma Mater Studiorum Università di Bologna (entity providing technological support for the Alumni Project)
- b) the registered office of the Graduway company (owner of the Alumni Portal support@graduway.com)

and will not transfer data to countries outside the European Union where there are no international agreements or standard contractual clauses.

10. RIGHTS OF THE DATA SUBJECT

In relation to the processing of your personal data, you may exercise your rights set out below by contacting the Association at the above e-mail address without any particular formalities:

- 1) to request confirmation as to whether or not personal data relating to you are being processed and, if so, to obtain access to the personal data and the following information:
 - a) the purposes of the processing;
 - b) the categories of personal data in question;
 - c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular if they are recipients in third countries or international organisations;
 - d) where possible, the intended data retention period or, if this is not possible, the criteria used to determine that period;
 - e) the existence of the Data Subject's right to request from the Association the rectification or erasure of personal data or the restriction of the processing of personal data concerning him/her or to object to their processing;

- f) the right to lodge a complaint with a supervisory authority;
 - g) if the data are not collected from the data subject, all available information on their origin;
 - h) the existence of an automated decision-making process, including profiling and, at least in such cases, meaningful information on the logic used, as well as the importance and expected consequences of such processing for the Data Subject.
- 2) where personal data are transferred to a third country or international organisation, the data subject has the right to be informed of the existence of appropriate safeguards relating to the transfer;
- 3) to request, and obtain without undue delay, the rectification of inaccurate data, taking into account the purposes of the processing, and the integration of incomplete personal data, also by providing a supplementary declaration;
- 4) to request the erasure of data if:
- a) personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - b) the Data Subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
 - c) the Data Subject objects to the processing, if there is no overriding legitimate reason for processing, or objects to processing for direct marketing purposes (including profiling for such direct marketing);
 - d) the personal data have been unlawfully processed;
 - e) the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the Association is subject;
 - f) the personal data were collected in connection with the provision of services by the Association from the information in our Association's database;
- 5) to request the restriction of processing concerning the Data Subject, in one of the following cases:
- a) the Data Subject disputes the accuracy of the personal data; in this case, the processing (i.e. suspension of processing) may be restricted for the period necessary for our Association to verify the accuracy of such personal data;
 - b) the processing is unlawful (e.g. because the data subject was not provided with the prior information required by law) and the data subject objects to the erasure of his or her personal data (i.e. he or she prefers that we keep them in our paper and/or computer archives) and instead requests that their use be restricted as above;
 - a) although the Association no longer needs them for processing purposes, the personal data are necessary for the establishment, exercise or defence of a legal claim;
 - d) the Data Subject has objected to the processing for direct marketing purposes, pending verification as to whether our Association's legitimate reasons prevail over those invoked by the Data Subject;
- 6) to obtain from the Association, upon request, the communication of third party recipients to whom personal data have been transmitted;
- 7) to withdraw their consent to the processing at any time, where previously given for one or more specific purposes, of their personal data, it being understood that this will not affect the lawfulness of the processing based on the consent given before withdrawal.
- 8) to receive, in a structured, commonly used and machine-readable format, the personal data concerning the Data Subject that he or she has provided to the Association and, if technically feasible, to have such data transmitted directly to another Controller without hindrance on our part, if the following (cumulative) condition is met:

- a) the processing is based on the consent of the data subject for one or more specific purposes, or on a contract to which the data subject is party and for the performance of which the processing is necessary, and
- b) the processing is carried out by automated means (software) (overall right to the so-called 'portability'). The exercise of the so-called right to portability is without prejudice to the right to erasure provided for above;
- 9) to not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or significantly affects them in a similar way. By way of clarification, we specify that we do not perform any automated processing of the above-mentioned kind.
- 10) to lodge a complaint with the competent supervisory authority under the GDPR (Data Protection Authority) or with the ordinary court.

11. HOW TO EXERCISE YOUR RIGHTS

In order to exercise the above rights, you may contact the Association as Joint Controller at the following e-mail address alumni.privacy@unibo.it. The Controller is obliged to provide you with a reply within one month of the request, or within three months if the request is particularly complex.

13. CONTACT DETAILS OF THE JOINT CONTROLLERS

The University informs known that it has appointed a Data Protection Officer (DPO) and the Association, not being subject to this obligation as a non-profit association, informs that it has appointed a consultant for data protection procedures. The respective contact details are given below:

for the University: - E-mail dpo@unibo.it - Pec scriviunibo@pec.unibo.it

for the Association: E-mail alumni.privacy@unibo.it - Pec almaematrixalumni@pec.it

14. ANY CHANGES TO THE POLICY

This Privacy Policy may be subject to change. You are therefore advised to check this Policy regularly and to refer to the most up-to-date version.