

PRIVACY POLICY

We hereby inform users in accordance with Article 13 of EU Regulation 2016/679 - General Data Protection Regulation (hereinafter, "**GDPR**") about the processing of personal data carried out through this website.

The processing of personal data is carried out in accordance with current data protection legislation and is based on the principles of fairness, lawfulness, transparency and data protection.

Please note that this privacy policy refers exclusively to the personal data of those who interact with the services accessible from the home page <https://www.alumni.hunimed.eu> (hereinafter, "**Website**"), as well as accessible through the Restricted Area of the Website, to which only former students of Humanitas University may register, without extending to any other websites that the user may have accessed through links on the Website.

1. Data Controller

The Data Controller is **Humanitas University**, P. Iva 97692990159, with registered office in via Rita Levi Montalcini n. 4, Pieve Emanuele (MI), in the person of its *pro tempore* Managing Director.

2. Categories of data subjects

Humanitas University processes personal data of users of the Website.

3. Type of Personal data processed

Various types of personal data is processed through the Website:

3.1. Browsing Data

- Technical Data

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

This category of data includes the IP addresses or domain names of the computers used by users connecting to the Website, the URI (Uniform Resource Identifier) notation addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment. This data is used only for statistical information (therefore it is anonymous), to check the correct functioning of the Website, and is deleted immediately after processing. The data could be used to ascertain responsibility in the event of hypothetical computer crimes to the detriment of the Website, as better reported in point 5.

- Cookies

The Website collects personal data using cookies or similar technologies. For further information, please visit "[Cookie Policy](#)" of the Website.

3.2. Data provided voluntarily by the data subject

Through the registration form for the Private Area, or during contacts with the data controller's offices, the data subject is required to provide personal data such as: first name, last name, profile photo, LinkedIn profile, mobile phone number, email address, and information about their current employment (please note that only the data marked with an asterisk in the online registration form are mandatory).

4. Services provided by the Website. Purposes of the processing, lawfulness of processing and data retention

4.1. Registration and access to the Private Area

Purpose of the processing: to allow users to register and manage their own account in the Private Area and access dedicated content, subject to verification by Humanitas University that the user meets the requirement of being a former student of Humanitas University. Providing personal data for this purpose is entirely optional; however, failure to do so will prevent registration access.

Legal basis: performance of a contract to which the user is a party (Article 6(1)(b) GDPR).

Data retention: personal data is retained until the account is deleted, which users can do by emailing privacy@humanitas.it. Upon account closure, data is retained for an additional period necessary to fulfil legal obligations and for the time frame allowed to assert legal claims, as determined by the statutory limitation periods under applicable Italian Civil Code provisions (Articles 2946 and following - e.g., up to 10 years).

5. Additional data processing activities

5.1 Compliance

Purpose: to meet legal obligations and regulatory requirement, including allowing users to exercise their privacy rights.

Lawful Basis: compliance with legal obligations to which the Controller is subject (art. 6(1)(c) GDPR).

Retention Period: personal information is retained for the duration required by applicable legal obligations.

5.2 Exercise and defence of rights in judicial proceedings

Purpose: to prevent fraud and protect Humanitas University's rights in legal proceedings.

Lawful Basis: legitimate interest of the Controller (art. 6(1)(f) GDPR).

Retention Period: personal information is kept for the entire litigation, extending until the expiration of appeal possibilities

6. Way of processing, recipients and purpose of communication of personal data

All data will be processed mainly in electronic format. Personal data as well as any other information that can be associated, directly or indirectly, with a specific user are collected and processed by applying technical and organisational security measures such as to ensure a level of security appropriate to the risk, taking into account the state of the art and the costs of implementation and, where applicable,

security measures prescribed by specific legislation, such as, but not limited to, measures prescribed by orders issued by the Data Protection Authority or by specific rules and regulations.

The personal data will be processed by:

- persons authorized by the Data Controller to process personal data, as employees and/or collaborators pursuant to Article 29 of the GDPR and 2-quaterdecies of the Privacy Code, who have received appropriate operating instructions, have committed to keep the data confidential or are subject to an appropriate legal obligation of confidentiality.
- subjects delegated and/or appointed by the Data Controller to carry out activities strictly related to the pursuing of specific purposes (including, but not limited to, technical maintenance operations of the Website and the services), duly appointed as Data Processors pursuant to Article 28 of the GDPR.
- subjects, bodies or authorities to whom the communication of the data subject's personal data is obligatory by force of legal provisions or orders of the competent authorities.

Subject to the above, personal data will not be disclosed and/or communicated to third parties.

7. Transfer of personal data outside the European Union

Personal data collected through this Website is not transferred outside the European Union and the European Economic Area.

Should such a transfer become necessary and/or unavoidable due to the organisational needs of the Data Controller, please note that

- will only be made to countries in respect of which there is an adequacy decision adopted by the European Commission;
- if it occurs in a country other than the one for which an adequacy decision referred to in the preceding paragraph has been issued, the transfer of data shall be governed by the Standard Contractual Clauses without prejudice to the adoption, subject to the agreement of the Parties involved, of another of the safeguards set out in Article 46 of the GDPR or the application of one of the derogatory mechanisms set out in Article 49 of the GDPR.

8. Data Subject rights and DPO contact details

In relation to the processing of personal data carried out through this Website, the data subject may at any time know the data concerning him/her, find out how they were acquired, check whether they are accurate, complete, up-to-date and well kept, assert the rights recognised to him/her by Art. 15 et seq. GDPR (right of access to data, right to rectification or erasure of data, right to limitation of or opposition to data processing, right to data portability, right to withdraw consent), by filling in the dedicated form on the website www.humanitas.it/privacy or by writing to privacy@humanitas.it or hunimed@pec.it.

For any further data protection activities, please refer to the Data Protection Officer (DPO), via Rita Levi Montalcini, 4 20090 Pieve Emanuele (MI), e-mail: dataprotectionofficer@humanitas.it.

If the data subject notices a violation of the law in the processing of his/her personal data, he/she has the right to lodge a complaint with the Italian Data Protection Authority, pursuant to article 77 of the GDPR. However, the possibility of appealing before the competent judicial authority remains unaffected.

For further information on data protection rights and regulations in general, please visit the website of the Italian Data Protection Authority at <http://www.garanteprivacy.it/>.

9. Updates

This Privacy Policy should be subject to updates. Users are therefore invited to periodically check their content.

