

Privacy Policy pursuant to Article 13 of EU Regulation 2016/679, regarding the processing of personal data

This policy, prepared pursuant to Italian Legislative Decree 196/2003 and EU Regulation 2016/679, is intended for Data Subjects who use the “Open Day Graduate Bocconi” platform, hereinafter also the “Event.”

To this end, please note that:

- The Data Subject is the natural person to whom the personal data belong.
- The Data Controller is Università Commerciale Luigi Bocconi, with registered office at Via Sarfatti 25, 20136 Milan (Bocconi University for the sake of brevity)

The Data Controller has designated as Data Processor:

- LiveForum s.r.l., with registered office in Milan (20143 - MI), Viale Cassala, 36, VAT number 11269810963, editor and manager of the Platform hosting the Event and responsible for processing users' personal data collected through the Platform (hereinafter also the "Data Processor").

1. Purpose and legal basis of processing.

The provision of the data requested during registration for the Event is free and optional, but necessary and can be revoked at any time; failure to communicate the data requested as mandatory on the registration page shall make it impossible to provide the services indicated. The personal data provided by the Data Subject will be used for the purposes indicated below:

1.1. Provision of the requested Services

- i. management of the request for access to the Event and subsequent management of all related obligations and related registration on the Platform;
- ii. use of the services provided through the Platform, including: virtual tour of the virtual classrooms, the chance to attend live direct sessions of Plenary Lectures and Workshops, access to Meeting Rooms, setting up appointments, interacting with other participants and representatives, through the functions available on the Platform, including live chat, video conference, etc.; in this regard, see Section 1.2. dedicated to specifications;
- iii. for sending notifications regarding requests for appointments or contact by other participants in the Event and by university contacts, as well as to allow interaction between connected users;
- iv. fulfillment of organizational and administrative activities;
- v. management of the request for information and technical assistance by the Data Subject through contact forms, spontaneous sending of emails, telephone contacts or other methods;
- vi. fulfilling any legal, accounting and tax obligations;
- vii. sending updates and information regarding the Event to the Data Subject, as well as communications regarding upcoming Events organized by the Data Controller;
- viii. sending updates and information relating to services offered by a specific university representative to the Data Subject during the Event, if the Data Subject has participated in virtual workshops, virtual meeting rooms or visited virtual stands of the specific university representative or participated in Plenary Lectures and only in relation to similar products or services (so-called soft spam). It should be noted that in this case any promotional messages may be sent only directly by the specific university representative and not by third parties, and that such communications may only concern products and services similar to those discussed during the Event, notwithstanding the possibility of the Data Subject to oppose the processing referred to in this point by simple request, as detailed below.

Legal basis. Regarding the purposes indicated in this Section 1 (i) (ii) (iii) (iv) (v) the lawfulness of processing is based on your free and optional consent pursuant to article 6, paragraph 1, letter a) as well as article 6, paragraph 1, letter b) of EU Regulation 679/2016, or for the need to process personal data for the provision of the services requested by the Data Subject and to meet the requests of the Data Subject. Regarding the purposes of point (vi), processing is carried out pursuant to article 6.1.c) of the Regulation, for compliance with a legal obligation.

Regarding the purposes indicated in point (vii), data may be processed for the purpose of directly sending informational material on the new physical and digital editions of the Event, having deemed that all this is to your liking. Finally, regarding the purposes indicated in point (viii), data may be processed for the purpose of directly sending informational material and updates relating to services offered by the university representative also during the Event, having deemed that all this is to your liking. The processing of your data in relation to points (vii) and (viii) is also based on the legitimate interest referred to in article 6.1.f) of the Regulation and pursuant to art. 130 paragraph 4 of Italian Legislative Decree 196/2003 (so-called soft spam), also in relation to Article no. 47 of the GDPR. In any case, pursuant to article 21 of the Regulation, you may oppose this processing at any time through the mechanisms made available: direct opt-out (for example in invitation emails) or by writing to the specific Data Controller and/or to the Data Processor (article 7 of the policy) to request the termination of communications and exercising the rights of the Data Subject.

1.2. Use of the functions of the Platform and Third Parties.

The processing of users' personal data is carried out to allow the Data Subject to make full use of all the services and functions of the Platform, which includes areas dedicated to conducting Plenary Lectures, virtual Workshops, virtual Meeting Rooms and virtual classrooms with university representatives. For their use, the following is specified:

- i. browsing within these virtual areas necessarily involves the visibility of your personal data (e.g. first name, last name, etc.) also by third parties (for example other connected users);
- ii. browsing within the Platform and the Data Subject's interaction with university representatives, setting up appointments, or participating in workshop sessions involve the viewing and acquisition of the Data Subject's data by the university representatives.
- iii. simply accessing the Platform (without accessing virtual workshops, virtual Meeting Rooms, virtual classrooms and Lectures, including Plenary) does not involve any sharing of the Data Subject's personal data with third parties and will not allow the Data Subject to receive updates and related information to services offered by any university representative during the Event.

Legal basis. The processing activities referred to in this Section 1.2 are instrumental to the use of the services provided by the platform itself, and lawfulness is based on the consent expressed at the time of registration pursuant to article 6, paragraph 1, letter a) of the Regulation, which may be revoked at any time. Specific withdrawal of consent in relation to the processing of data referred to in this Section 1.2 will not be understood as a withdrawal of consent also in relation to the previous Section 1.1.

1.3. Processing of personal images

During the event, the image of the Data Subject's profile may be visible (acquired for example by LinkedIn following registration, if applicable), and videos, frames, images, photos and multimedia materials may also be made, in the context of which the user's image, data (first name and last name) and/or voice could be incorporated, including incidentally.

The acquisition and/or realization of these materials may take place for informational, promotional purposes of the event or provision to the public and/or the media (press, television), social networks.

In any case, it is hereby specified that virtual appointments within Meeting Rooms will not be recorded.

Images acquired shall be processed in accordance with the legislation on copyright (RD 633/1941) and regulations on the use of images of others (article 96 and subsequent articles of RD 633/1941) and EU Regulation 679/2016. Therefore, with nothing to claim, as declarant the Data Subject authorizes the Data Controllers and the Data Processor to record and/or acquire the aforementioned material, for the purposes indicated. For these aims, the Data Subject declares to:

- a. renounce any claim or demand, including of an economic nature, regarding the future uses of the reproductions subject to this release towards the Data Controllers and Data Processors expressly authorized to use them;

- b. release the Data Controllers from any liability, including economic, concerning incorrect use of photographic and/or audio video material by users of websites, social networks or, in any case, third parties;
- c. have read and understood the entire policy including this release and be aware that ticking the box is equivalent to signing the release under their own responsibility.

1.4. Communication of the services and activities of Università Commerciale Luigi Bocconi

- i. The data you provide will be used to send update communications relating to the activities and initiatives organized by Università Commerciale Luigi Bocconi, all communications relating to the development of the area regarding that covered during the Event. These communications may be sent in the form of newsletters and promotional and/or commercial communications (so-called soft spam).
- ii. Data may be processed to analyze the interests of participants in the workshop areas in order to understand their interests and offer targeted communications related to their preferences in relation to a specific area or product sector, therefore also to allow the improvement of the services offered.

Legal basis. Regarding the purposes of this Section 1.4 (i) the lawfulness of processing is based on article 6, paragraph 1, letter a) and letter f) of EU Regulation 679/2016, i.e. on the consent of the Data Subject and on the Data Controller's legitimate interest to provide a better service, more relevant to your preferences.

Furthermore, it is hereby specified that your data may also be processed on the basis of article 6, paragraph 1, letter f) of the Regulation and pursuant to article 130 paragraph 4 of Italian Legislative Decree 196/2003 (so-called soft spam), assuming your interest in being updated on initiatives; in all cases, consent may be revoked at any time using the opt-out mechanisms made available (following the instructions given in each communication or newsletter) or by contacting Università Commerciale Luigi Bocconi or the Data Processor at the addresses indicated in article 8 of the policy.

2. Provision of data and consequences of lack of consent.

As indicated in the previous points, registration on the Platform is free and optional and requires having read this policy. Provision of the data reported in the registration form for the Platform is mandatory in order to allow registration on the same and provision of the requested services. Failure to provide such data will result in failure to register with the Platform and consequently the inability to access its contents and functions.

3. Personal Data Subject to Processing

Processing relates to data of a common nature, personal identification and information technology of the Data Subject; in particular:

a. Browsing data

During their normal operation, the computer systems and software procedures used to operate this Website acquire some personal data. Such data transmission is implicit in the use of internet communication protocols. This is information that by its very nature could lead to the identification of users through processing and association with data held by third parties. This data category includes IP addresses or names for computer domains used by those users who connect to the website, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of request, the method used to submit the request to the server and other details relating to the communication protocol, the operational system and the information environment of users. These data are used for the sole purpose of obtaining anonymous statistical information about the use of the Website to check that it is functioning correctly, to identify any anomalies and/or abuse, and are deleted immediately after processing.

b. Data provided voluntarily by the Data Subject

Identification data of the Data Subject, including: first name, last name, profile picture and other information suitable for identifying or making them identifiable such as the name of the company where they work, their professional title, etc. This information is acquired following registration on the Platform – using a specific form – and following navigation; data may also be communicated through the information request form or email. Sensitive data pursuant to article 9.1 of EU Regulation 2016/679 will not be processed unless prior express consent has been given by the Data Subject.

4. Recipients of processing.

Data may be processed by:

- the Data Controller and the Data Processor for the purposes indicated above, as well as by any other Data Processors who may be appointed;
- the subjects with whom it is necessary to interact for the provision of the Services (for example hosting providers)
- external parties designated as Data Processors, included in the following categories: companies that offer email services and/or that carry out billing and/or tax management activities; companies that offer management and maintenance services for the information infrastructure of the Platform.

Your data may be disclosed to:

- the Judicial Authority, in relation to requests by the same; third parties for the fulfillment of tax or administrative obligations, or if it becomes necessary to achieve the purposes indicated above.

The personal data of the Data Subject registered on the Platform will not be disseminated or transmitted to third parties in any way contrary to the provisions of this Policy. Regarding personal images, please refer to what is indicated in Article 1.3 of this policy.

5. Method and place of processing.

Personal data will be collected, processed, recorded, consulted, stored, made available to third parties, profiled, extrapolated, according to the terms and conditions of this Policy; in any case, data processing takes place in compliance with the purposes for which they are collected and processed by the personnel specifically appointed by the Data Controllers and Data Processors, through paper, computer and electronic media.

More specifically, data will be processed by:

- Università Commerciale Luigi Bocconi, with registered office at Via Sarfatti 25, 20136 Milan.
- LiveForum s.r.l., with registered office in Milan (20143 - MI), Viale Cassala, 36, VAT number 11269810963, by means of its personnel in marketing and communication, at its offices and on servers located at the same offices.

6. Processing duration and data retention period

In general, data will be processed for a period of time appropriate to the achievement of the aforementioned purposes by the personnel specifically appointed by the Data Controllers and Data Processors for a maximum time of 5 years.

Data are stored in paper and electronic archives at the headquarters of the Data Controllers and Data Processors (for the time necessary to carry out their assignment) to allow the pursuit of the necessary purposes with full assurance of the adoption of the security measures provided by the legislator to protect the collected data, in order to avoid the risks of data loss or theft, unauthorized access, illicit and incorrect use.

7. Rights of Data Subjects

Data Subjects can exercise at any time the rights provided for by articles 15 to 22 and by article 34 of EU Regulation 679/2016; in particular the Data Subject:

- Can exercise the right to access personal data (Article 15 of the Regulation),
- Has the right to obtain the correction of inaccurate personal data (article 16 of the Regulation);
- Has the right to obtain the cancellation of data in the presence of the conditions indicated in article 17 of the Regulation;
- Has the right to obtain the limitation of processing in the presence of the conditions provided for by article 18 of the Regulation;
- Has the right to request the portability of data concerning him/her (article 20);
- Has the right to object to automated processing, including profiling (article 21).

Furthermore, the Data Subject may at any time exercise the right to revoke the consent given for one or more purposes without prejudice to the lawfulness of processing, based on the consent given before the revocation.

The Data Subject also has the right to lodge a complaint with the National Supervisory Authority, or the Authority for the Protection of Personal Data, based in Piazza Venezia 11, IT-00187, Rome (<http://www.garanteprivacy.it/>)

Requests should be addressed to:

- Università Commerciale Luigi Bocconi, with registered office at Via Sarfatti 25, 20136 Milan.
- LiveForum s.r.l., based in Milan (20145 - MI), Viale Cassala, 36, at the following email address: privacy@liveforum.net.

8. Contact Information

- Università Commerciale Luigi Bocconi: with offices at Via Sarfatti 25, 20136 Milan, at the following address: dpo@unibocconi.it;
- LiveForum srl, based in Milan (20145 - MI), Viale Cassala, 36, at the following email address: privacy@liveforum.net.

COOKIE POLICY

Definition of cookies

Cookies consist of small pieces of code that the websites visited by the user send to the browser, where they are stored before being re-transmitted to the same sites during browsing or the next visit by the same user. While browsing a website, users may also receive cookies on their terminals that are sent from different websites or servers (known as "third parties"), which may contain certain elements (such as, for example, images, maps, sounds, specific links to pages on other domains) found on the website that the user is visiting. In this way, for example, cookies allow and/or facilitate access to some internet pages to improve the user's browsing experience (i.e., they allow the storage of pages visited and other specific information, such as pages most frequently viewed, connection errors, etc.), or they allow profiling activities. Therefore, in order to guarantee complete and easy use of a website, users should set their browser to accept cookies.

Type of cookies used by the website.

Cookies are not used for user profiling, nor are other tracking methods used.

Session cookies (non-permanent cookies) will be used for strictly limited purposes which ensure that the Website can be navigated safely and efficiently. The storage of session cookies in computers or browsers can be controlled by the user, whereas information relating to cookies remains recorded in the service logs on servers at the end of HTTP sessions, with storage times not exceeding seven days, similar to other browsing data.

These cookies do not require the user's prior consent to be installed and used (see 8 May 2014 provision from the Authority for the Protection of Personal Data concerning: "Identification of simplified procedures for the information and the acquisition of consent for the use of cookies").

Data controller

The Data Controller is Università commerciale Luigi Bocconi, with registered office in Milan, Via Roberto Sarfatti 25.

Rights of Data Subjects

Users may exercise their right to oppose the full use of cookies by leaving this website and thus also refusing the use of essential technical cookies necessary for its operation.

Any request for information or clarification or exercising of rights can be addressed to the Data Controller at the following email address privacy@liveforum.net

Furthermore, users always have the right to lodge a complaint with the Authority for the Protection of Personal Data, pursuant to article 77 of the Regulation, which can be contacted at garante@gpdp.it or through the website <http://www.gpdp.it>.

Changes to this policy

This policy may change over time, which may be related to the entry into force of new sector regulations, the updating and/or provision of new services or arising from technological innovations. Users are therefore encouraged to consult this page periodically.