

"Student" privacy policy



1. Data controller

The Fondazione Centro di Musicologia Walter Stauffer, with registered office in Cremona - Corso Garibaldi n. 178, VAT and tax code 00319130191, hereinafter referred to as the "Controller", guarantees compliance with the regulations on the protection of personal data by providing the following information on data processing, pursuant to art. 13, EU Regulation 2016/679 (General Data Protection Regulation - GDPR) and subsequent amendments.



2. Data processed, purposes and legal bases for processing

Personal data provided by the subject are collected and processed for the following purposes:

- a) to correctly and completely meet requirements relating to the student's application and for any subsequent enrollment in courses managed by the Data Controller;
- b) for the fulfillment of legal obligations or to process requests from judicial authorities;
- c) for the maintenance of "alumni" archives (art. 2 sexies of Legislative Decree 196/2003 paragraph q), private archive of significant cultural interest pursuant to art. 13 of the Code of cultural heritage, Legislative Decree n. 42/2004).

The legal basis for the data processing:

- with respect to the purposes referred to in point 2 letters a) and b), is the performance of a contract
 to which the Data Subject is party or the performance of pre-contractual measures adopted at the
 request of the Data Subject;
- with respect to the purposes referred to in point 2, letter c), is the significant public interest





3. Nature of data provision

The provision of data:

- with respect to the purposes referred to in point 2 letters a) and b), is compulsory and any refusal will make it impossible for the Data Controller to implement the contractual commitments undertaken;
- with respect to the purposes referred to in point 2, letter c), consent is considered optional for these purposes, therefore any refusal does not make it impossible to implement the contractual commitments undertaken.



4. Places and methods of data processing and retention times

The data collected by the site are processed at the Data Controller's headquarters.

The data collected will be processed by electronic or automated, computerized and telematic means, or by manual processing with logic strictly related to the purposes for which the personal data were collected and, in any case, in order to ensure the security of the same.

The data are kept for the time strictly necessary to manage the purposes for which the data are processed ("conservation limitation principle", Art.5, EU Regulation 2016/679) or in compliance with the deadlines provided for by current regulations and legal obligations, 1 year in the case of an application that does not result in enrollment.

Periodic verification of the obsolescence of stored data is performed in relation to the purposes for which it was collected.

In all cases, the Data Controller practices rules that prevent the retention of data for an indefinite period of time and therefore limits the retention time in compliance with the principle of minimising data processing.



5. Subjects authorised to process data, data processors and communication of data

Data processing is carried out by the Data Controller's staff, those identified and authorized to process data according to specific instructions as provided for by existing law.



The data collected, within the limits provided for, and to the extent that the processing of data is necessary or instrumental for the execution of the same, may be processed by third parties appointed as External Data

Processors, or, if necessary, communicated to all subjects necessary for the proper performance of the purposes set out in paragraph 2 (for example, fiscal requirements, maintenance of IT systems etc).

In addition, the data collected may be processed by third parties, with the qualification of independent Data Controllers, involved with the Data Controller in academic-educational activities for the execution of the purposes set out in point 2 (e.g. agreements on educational projects, concerts, etc...).

The data collected may be provided in case of legitimate request, only in the cases provided for by law, by the Judicial Authority.

Your personal data will in no case and for no reason whatsoever be disclosed.



6. Data transfer to non-EU countries

Collected data will not be transferred outside the European Union.



7. Rights of the Data Subject

In relation to the personal data communicated, the Data Subject has the right to exercise the following rights:

- a. (Art. 7.3 EU Regulation 679/2016 GDPR) withdrawal of consent;
- b. (Art. 15 EU Regulation 679/2016 GDPR) access and request a copy;
- c. (Art. 16 EU Regulation 679/2016 GDPR) request correction;
- d. (Art. 17 EU Regulation 679/2016 GDPR) request cancellation ("right to be forgotten");
- e. (Art. 18 EU Regulation 679/2016 GDPR) obtain the limitation of processing;
- f. (Art. 20 EU Regulation 679/2016 GDPR) receive them in a structured, commonly used and machine-readable format for the purpose of exercising the right to portability;
- g. (Art. 21 EU Regulation 679/2016 GDPR) oppose the processing.

The subject can exercise her or his rights, as well as request more information relating to her or his personal data, by sending an e-mail to privacy@stauffer.org specifying in the subject line the content of her or his request.

Requests relating to the Data Subject's rights will be processed without undue delay and, in any case, within one month of the request; only in cases of complexity and according to the number of requests may this period be extended by a further 2 (two) months.

We remind you that it is your right (ex art. 77 EU Regulation 679/2016 - GDPR) to lodge a complaint with the Data Protection Authority, whose contacts are available <u>here</u>.

Last updated: November 2, 2023