

Website Privacy Policy

Processing of personal data

All personal data to be used in order to utilize the services offered by Unitelma Sapienza will be handled in compliance with Legislative Decree no. 196 of 30 June 2003, the Personal Data Protection Code.

This privacy policy aims at informing data subjects about the processing activities relating to the provision of e-learning services, which are available through the purchase of one of the courses accessible on University of Rome Unitelma Sapienza's website <https://www.international.unitelmasapienza.it>. As for the processing of personal data by University of Rome Unitelma Sapienza in the context of the provision of its services to the University's students, refer to the privacy policy provided during the registration to the website or during the courses' purchase, and to the information available in the website's restricted area.

Privacy Policy

a. Personal data processed

Browsing data. The software systems and procedures on which this website runs might process some personal data whose transmission is inherent to the Internet's communication protocols. The aforementioned data category (which includes, e.g. and not exhaustively, IP and DNS addresses) is processed by the controller for statistical reasons and in an anonymous form, but can be cross-correlated through a series of operations in order to render the user identifiable, for instance to ascertain its liability in case of damages to the website's infrastructure.

Cookies. Cookies are small, automatically generated text files that get downloaded by the user's device after browsing the website. Some of those files (*session cookies*) are removed automatically at the end of the browsing session. Some other cookies remain on the user's device after the end of the browsing session, for instance when the user decides to have its user-id and password stored in one of those files in order to log in automatically to the restricted area. If the user does not desire to store cookies, he can avoid downloading them through the appropriate browser configuration. In certain cases, however, cookies might be necessary for the functioning of some parts of the website.

University of Rome Unitelma Sapienza utilizes third party (i.e. Google's) analytic cookies in order to improve the service's quality and to evaluate its content's usage. In relation to those cookies, please refer to [Google's cookie policy](#). By continuing to browse the website, the user consents to the deployment of cookies in its device.

User-generated content. The voluntary and explicit provision of personal data by the user is functional and necessary for the access to the services provided by

the controller through its website, specifically for the purchase and fruition of the online courses. The data processed in this respect is essentially personal and fiscal data handled for compliance purposes (e.g. billing).

b. Processing purposes

The user's personal data are gathered and processed in order to allow the controller to provide its services in respect of the general principles of fairness, lawfulness and transparency. The processing of user data is done for the following activities, instrumental for the service's provision: delivery of the authenticating credentials necessary to access the restricted area, answering the user's queries on the services offered and on their modalities, provision of the courses or of the trial lessons requested by the user, billing and financials, instrumental activities relating to the services requested by the user.

With the user's explicit consent, its personal data can be also processed in order to advertise additional courses offered by University of Rome Unitelma Sapienza.

c. Processing modalities

In order to comply with the aforementioned obligations and to achieve the aforementioned goals, the personal data processed will be handled both through a digital database and through a physical archive. All personal data will be processed in compliance with the minimum security measures sanctioned by the applicable law, in order to minimize the risks of data destruction or loss, of unauthorised access and of processing beyond the scope of its original purpose.

d. Data disclosure by the user

The disclosure of the personal data concerning the fields marked with an asterisk in the form is necessary for the service's provision.

e. Data disclosure towards third parties

The user's personal data may be disclosed, through various means, to the data controller and/or processor, and also to third parties, in order to provide or optimize the service requested by the user.

f. Data subject's rights

With regard to the processing of its data, the user can exercise, even by delegation or through a proxy, the rights granted by art. 7 of the Legislative Decree no. 196 of 30 June 2003, i.e. the right of access, the right to obtain the data rectification, updating or integration, the right to erasure, anonymization or blocking of the personal data unlawfully processed, the right to opt out for legitimate reasons and the right to opt out from the processing of personal data with marketing or commercial purposes.

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Section 7: **Right to Access Personal Data and Other Rights.**

1. A data subject shall have the right to obtain confirmation as to whether or not personal data concerning him exist, regardless of their being already recorded, and communication of such data in intelligible form.

2. A data subject shall have the right to be informed

a) of the source of the personal data;

b) of the purposes and methods of the processing;

c) of the logic applied to the processing, if the latter is carried out with the help of electronic means;

d) of the identification data concerning data controller, data processors and the representative designated as per Section 5(2);

e) of the entities or categories of entity to whom or which the personal data may be communicated and who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing.

3. A data subject shall have the right to obtain

a) updating, rectification or, where interested therein, integration of the data;

b) erasure, anonymization or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;

c) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.

4. A data subject shall have the right to object, in whole or in part,

a) on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;

b) to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.

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g. Data controller

The data controller is University of Rome Unitelma Sapienza, as represented by its *pro tempore* legal agent, established in Via Regina Elena 295, 00161 Rome.