

## NOTICE PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (“GDPR”), TEMPLE UNIVERSITY OF THE COMMONWEALTH SYSTEM OF HIGHER EDUCATION, as the data controller (hereinafter also referred to simply as the “University” or “Controller”), provides its students attending the Rome campus, applicants for admission to its courses held in Rome and, where relevant, their parents or guardians, information regarding the processing of personal data collected in the context of guidance, selection, enrollment, course attendance, the use of academic and administrative services, as well as other related institutional activities, including accommodation services, carried out in relation to the University’s Rome campus.

The processing is carried out in accordance with the principles set out in Article 5 of the GDPR (lawfulness, fairness and transparency; purpose limitation; data minimization; accuracy; storage limitation; integrity and confidentiality; accountability), as well as the measures regarding the controller’s accountability referred to in Articles 24 and 25 of the GDPR.

### 1. Data Controller and contact details

The Data Controller is TEMPLE UNIVERSITY OF THE COMMONWEALTH SYSTEM OF HIGHER EDUCATION, registered in the Register of Legal Entities at the Prefecture of Rome – Territorial Office of the Government under no. 1193 of 29 September 1987 (represented by Emilia Alexandrova Zankina-Kyurkchieva, legal representative of the Italian branch of Temple University), with registered office at Via di San Sebastiano 16, Roma 00187, certified email [templeuniversityabroad@pec.it](mailto:templeuniversityabroad@pec.it).

The Data Protection Officer (“DPO”), where appointed pursuant to Articles 37–39 of the GDPR, can be contacted at [privacy@temple.edu](mailto:privacy@temple.edu).

### 2. Categories of personal data processed

Pursuant to Article 4(1) of the GDPR, the University may process, within the limits of relevance and necessity in relation to the purposes pursued, the following categories of personal data:

- identification, personal and contact details, such as first name, surname, tax code, date and place of birth, residence or domicile, email addresses, telephone numbers, passport number or other identity document number, credentials and IP addresses;
- data relating to academic, university and administrative status, such as qualifications, grades, study plans, academic career, test and exam results, certifications and any further information relevant to the management of the relationship with the student;
- financial, asset and payment data, including that required for fees, contributions, refunds, financial assistance, scholarships, grants and other benefits;
- images, audio-video recordings and data associated with accounts used to access the University’s IT and digital services;
- special categories of personal data, pursuant to Article 9 of the GDPR, such as data relating to health, disabilities (including learning disabilities) or specific needs, sexual orientation, racial or ethnic origin, where the processing of such data is necessary for the provision of support measures or other requested services, including accommodation services;
- data relating to criminal convictions and offences or related security measures, only in the cases permitted by Article 10 of the GDPR and applicable national legislation.

Personal data may be collected directly from the data subject or, in the cases permitted by Article 14 of the GDPR, from third parties, such as previous schools, partner organizations, family members or guardians, international bodies, funding bodies or public authorities.

### **3. Purposes of processing and relevant legal bases**

Personal data is processed for specific, explicit and legitimate purposes, in accordance with Article 5(1)(b) of the GDPR. In particular:

- management of guidance, application, selection, admission, enrollment, registration, and renewal of registration procedures and, more generally, the implementation of pre-contractual measures taken at the data subject's request and the management of the relationship with the student, in accordance with Article 6(1)(b) of the GDPR;
- compliance with obligations laid down by laws, regulations, European Union legislation, provisions of the competent authorities or administrative, accounting and tax obligations, pursuant to Article 6(1)(c) of the GDPR;
- organization and management of teaching, examinations, laboratory activities, libraries, work placements, exchange programs, support services, guidance and other services related to the student's academic career, pursuant to Article 6(1)(b) of the GDPR and, where necessary, Article 6(1)(f) of the GDPR;
- management of financial benefits, concessions, scholarships, accommodation, sporting activities, trips or study visits, counselling, placement services and postgraduate initiatives, to the extent that such activities are functionally linked to the relationship with the University, pursuant to Article 6(1)(b) of the GDPR;
- safeguarding the safety of persons, university assets and infrastructure, access control and the management of service or emergency communications, in accordance with Article 6(1)(f) of the GDPR;
- sending newsletters, promotional communications, information on events, non-essential institutional initiatives, placement opportunities and further training courses, only with the data subject's prior consent, in accordance with Article 6(1)(a) of the GDPR;
- the creation, use and dissemination of images, photographs, audio or video recordings for informational, institutional, promotional or documentary purposes, only with the data subject's prior consent, in accordance with Article 6(1)(a) of the GDPR;
- management of accommodation services, pursuant to Article 6(1)(b) of the GDPR and, in the case of the processing of special categories of data, pursuant to Article 6(1)(a) of the GDPR;
- management of accidents and illnesses affecting students, pursuant to Article 6(1)(d) of the GDPR;

Where, for the provision of specific services, such as accommodation, the processing of special categories of personal data is necessary, this will take place only in the cases permitted by Article 9(2) GDPR and, in particular, on the basis of the data subject's explicit consent pursuant to Article 9(2)(a) of the GDPR, unless otherwise expressly provided for by law.

### **4. Nature of the provision of data and consequences of any refusal**

Pursuant to Article 13(2)(e) of the GDPR, the provision of data requested for administrative, contractual, institutional or legal purposes is necessary. Any refusal to provide such data, in whole or in part, may prevent the University from assessing the application, completing enrollment, providing the requested services or fulfilling its regulatory obligations.

The provision of data requested on the basis of consent is, however, optional. Consent, where given, may be withdrawn at any time in accordance with Article 7(3) of the GDPR, without affecting the lawfulness of the processing carried out prior to the withdrawal.

### **5. Methods of processing and security measures**

Processing is carried out using paper-based, IT and electronic means, in accordance with procedures strictly related to the purposes indicated above and in a manner suitable for ensuring the security, integrity, availability and confidentiality of the data, in accordance with Articles 5(1)(f), 24, 25 and 32 of the GDPR.

Processing operations may include the collection, recording, organization, structuring, storage, consultation, processing, modification, selection, retrieval, comparison, use, disclosure, restriction, erasure and destruction of data, in accordance with Article 4(2) of the GDPR.

The data is processed by personnel expressly authorized in accordance with Article 29 of the GDPR and Article 2-quaterdecies of Legislative Decree 196/2003, as amended by Legislative Decree 101/2018, who act on the basis of appropriate instructions.

In the case of health-related data, the University will comply with the safeguards provided for in Article 2-septies of Legislative Decree No. 196/2003.

## **6. Recipients of personal data**

For the purposes indicated, the data may be disclosed or otherwise made accessible, within strictly relevant limits, to:

- internal University staff authorized to process the data;
- providers of IT, administrative, accounting, logistics, insurance, archiving, teaching support or organizational services, appointed, where necessary, as data processors pursuant to Article 28 of the GDPR;
- partner organizations, foreign universities, and parties involved in international mobility programs, internships or work placements, to the extent necessary for the management of the relevant activities;
- banks, payment institutions, consultants, professionals, public authorities, social security, insurance or tax bodies, where disclosure is required by law or is otherwise necessary for the management of the relationship;
- the headquarters of Temple University (located at 1801 N. Broad Street, Philadelphia, PA 19122, United States), which will use the data in accordance with the *Data Usage, Governance and Integrity Policy*.

The recipients act, as the case may be, as independent data controllers, data processors pursuant to Article 4(8) and Article 28 of the GDPR, or authorized persons pursuant to Article 29 of the GDPR.

Apart from the cases indicated above, the data is not disclosed, unless there is a specific legal obligation or prior consent from the data subject, where required.

## **7. Transfer of data to third countries or international organizations**

Where, for reasons related to course attendance, international programs, digital services or other institutional activities, it becomes necessary to transfer personal data to countries outside the European Economic Area or to international organizations, such transfer shall take place in accordance with Articles 44–49 of the GDPR.

In particular, the transfer may take place on the basis of an adequacy decision pursuant to Article 45 of the GDPR, appropriate safeguards pursuant to Article 46 of the GDPR, the derogations set out in Article 49 of the GDPR, or any other valid basis provided for by the applicable legislation.

## **8. Data retention period**

Pursuant to Article 13(2)(a) of the GDPR, personal data shall be retained for a period not exceeding that necessary for the purposes for which they are collected and processed, in accordance with Article 5(1)(c) and (e) of the GDPR.

Special categories of personal data relating to health, disability (including learning disabilities) or specific needs, sexual orientation, and racial or ethnic origin are retained for up to 12 months following the end of processing.

Data relating to university career, academic results and essential administrative documentation may be retained for extended periods, or, in cases provided for by law, indefinitely, for the purposes of certification, archiving, historical documentation and the protection of the rights of the University and data subjects.

Data processed for promotional purposes, newsletters or the use of images and audio-video recordings on the basis of consent are retained until consent is withdrawn and, in any event, for any different period determined by the University in accordance with the principles of necessity and proportionality.

### **9. Automated decision-making and profiling**

Unless otherwise specified in relation to individual services, personal data shall not be subject to decisions based solely on automated processing, including profiling, which produce legal effects concerning the data subject or similarly significantly affect them, in accordance with Article 22(1) of the GDPR.

Where the University uses automated evaluation tools for specific procedures, it shall provide the data subject with the information required under Articles 13(2)(f) and 14(2)(g) of the GDPR, as well as the safeguards provided for in Article 22(2) and (3) of the GDPR.

### **10. Rights of the data subject**

The data subject may exercise the rights recognized by Articles 15–22 of the GDPR against the Data Controller, within the limits and subject to the conditions set out therein, including:

- the right of access (Article 15 of the GDPR);
- the right to rectification of inaccurate data and to have incomplete data completed (Article 16 of the GDPR);
- the right to erasure of data, in the cases provided for in Article 17 of the GDPR;
- the right to restriction of processing (Article 18 of the GDPR);
- the right to data portability, where applicable (Article 20 of the GDPR);
- the right to object to processing, in the cases provided for in Article 21 of the GDPR;
- the right to withdraw consent at any time, pursuant to Article 7(3) of the GDPR.

This is without prejudice to the right to lodge a complaint with the Data Protection Authority, in accordance with Article 77 of the GDPR, as well as the right to seek judicial remedy in accordance with Articles 78 and 79 of the GDPR. To lodge a complaint, you may use the complaint form available on the Data Protection Authority's website. Requests to exercise your rights may be sent to the following email address [privacy@temple.edu](mailto:privacy@temple.edu).