

PRIVACY POLICY

European University of Rome, with registered office in Rome, at Via degli Aldobrandeschi no. 190, in his capacity of Data Controller (hereinafter also “UER” or “**Data Controller**”) pursuant to Article 12 of the Regulation (EU) no. 2016/679, bearing the so-called “*General Data Protection Regulation*” (“**GDPR**”), hereby informs those who interact with UER through the website <http://www.universitaeuropeadiroma.it> (hereinafter also “**Site**”) and use the services provided through it about the data management policies adopted.

This Privacy Policy refers exclusively to the data collected through the Site and to the cookies used for browsing the Site's web pages and does not extend to data collected directly, or through cookies, from sites managed by other parties to whom the Site refers.

This document constitutes a simplified and general privacy policy, pursuant to article 12 GDPR; the detailed privacy policy pursuant to article 13 GDPR will be provided at the time of data acquisition, to access it click here [link].

General principles of data processing

University implements adequate technical and organizational measures in order to guarantee, and be able to demonstrate, that the processing of data provided by you is carried out in accordance with the provisions of the GDPR taking into account the nature, scope, context and purposes of the processing, as well as of the risks, for the rights and freedoms of natural persons, connected to the data processing and its different probabilities and seriousness. This document is therefore subject to periodic review, in order to ensure full adherence and compliance with the procedures and practices followed by the University.

Data Controller

The Data Controller is, pursuant to Article 4 GDPR, European University of Rome, with registered office in Rome, at via degli Aldobrandeschi no. 190.

Data Protection Officer

In order to offer You an easier contact point for exercising the rights by GDPR, the Data Controller has appointed its own Data Protection Officer (“DPO”), the Attorney Elena Maggio, who can be contacted to the following email address dpo.emaggio@unier.it or by calling the telephone number +39 333.2160001, as well as writing, with a communication addressed to the head office of the Data Controller, to the attention of the DPO.

Personal Data and Purposes of processing

For the purposes of this Privacy Policy we inform you that the Site (or third party applications that this Site uses) automatically collects browsing data such as: IP addresses or domain names regarding the terminal you used to access this Site, access time, latency time, browser and operating system features used for access, page visit time and sequence of pages viewed.

These data are processed exclusively in an aggregate and anonymized form in order to understand how the University can improve the quality of the Site navigation.

Optional or mandatory consent

The processing of data arising from navigation is necessary for browsing, for this reason, by continuing to consult the pages of this Site, you grant implicit consent pursuant to art. 6, par. 1, lett. b) GDPR.

Way of processing

Data Controller processes Your personal data in compliance with the guarantees of confidentiality and adequate security measures provided by the current legislation, with and without the aid of IT tools, with logic strictly related to the purposes of the processing.

Transfer and disclosure of personal data

Your personal data will be processed within the European Union and stored on server situated inside the European Union.

In no case Your data will be disclosed to third parties, unless specifically requested by the judicial authority.

Retention of personal data

Your data will be processed for the time of navigation and will be subsequently aggregated for statistical purposes.

Data Subject's rights

In connection with the personal data provided by You, pursuant to Articles 15-22 GDPR, You have the right to:

- (i) access and ask for a copy;
- (ii) ask the correction;
- (iii) ask the deletion;
- (iv) obtain the limitation of processing;
- (v) object to the processing;
- (vi) receive the personal data provided to the Data Controller, in a format of common use and readable by automatic device;
- (vii) lodge a complaint with the Italian Data Protection Authority pursuant to Article 77 GDPR. To this end You can use the template made available by the Data Protection Authority at the following link:

<http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524>.

For exercising Your rights or for revoking Your consent, You can contact the DPO, the Attorney Elena Maggio, sending an email to the following email address dpo.emaggio@unier.it or by calling the following telephone number +39 333.2160001, as well as writing with a communication addressed to the head office of the Data Controller, to the attention of the DPO.

Your request will be detected as soon as possible and, however, in the terms of GDPR.

COOKIE POLICY

This "Cookie Policy" section has the specific aim of illustrating the different types of cookies installed on the Site, the purposes and how to use the same as well as providing indications about the ways in which You can deny, even later, your consent and / or modify, at any time and in an easy way, the options related to the use of cookies by the Site.

What are cookies?

Cookies are small text strings that sites visited by the user send to your terminal through the browser used to open and consult the web pages, where they are stored before being re-transmitted to the same sites at the next visit by the same user. While browsing on a web site, user can also receive on his terminal cookies that are sent from different websites or web servers (so-called "third parties"), on which certain elements may reside (such as, for example, images, maps, sounds, specific links to pages of other domains) present on the site that user is visiting.

By default, almost all web browsers are set to automatically accept cookies.

In the Provision no. 229 of 8 May 2014, the Italian Data Protection Authority has identified the following macro-categories of cookies.

1. Technical cookies: these cookies are used for the sole purpose of *“transmitting a communication over an electronic communication network, or as strictly necessary for the provider of an information society service explicitly requested by the subscriber or user to provide this service”* (see Article 122, paragraph 1, of Legislative Decree No. 196/2003, also Privacy Code). They are not used for other purposes and are normally installed directly by the website owner or manager. They can be divided into:

- navigation or session cookies, which guarantee the normal browsing and use of the site (allowing, for example, to make a purchase or authenticate to access to restricted areas);

- analytics cookies, similar to technical cookies when used directly by the site manager to collect information, in aggregate form, on the number of users and how they visit the site;
- functionality cookies, which allow the user to browse according to a series of selected criteria (for example, the language, the products selected for purchase) in order to improve the service rendered to the same.

For the installation of these cookies, the prior consent of the users is not required, while remains the obligation to provide the privacy notice pursuant to art. 13 of the Regulation (EU) no. 2016/679, which the site manager, if he uses only such devices, will be able to provide in the manner he considers most suitable.

2. Profiling cookies: they are designed to create user profiles and are used in order to send advertising messages in line with the preferences shown by the user in the context of web browsing.

Due to the particular invasiveness that such devices may have in the private sphere of users, European and Italian legislation provides that the user must be adequately informed about their use and express their valid consent. Refers to them Art. 122 Privacy Code where it provides, in paragraph 1, that *"the storage of information in the terminal equipment of a contractor or of a user or the access to information already stored is permitted only if the user has expressed his own consent after having been informed using the simplified procedures referred to in Article 13, paragraph 3"*.

Cookies can be installed on the user's terminal by the same site manager that the user is visiting (which can be briefly referred to as "**publisher**") or by a different site that installs cookies through the first (cd "**third party**") "). The Italian Data Protection Authority distinguishes between two subjects in order to correctly identify the respective roles and the respective responsibilities, with reference to the release of the information and to the acquisition of the consent of the online users. In fact, it is not possible to charge the publisher of providing the privacy notice and acquiring the consent for the installation of cookies within its site, even for those installed by "third parties", as the publisher often does not directly know all the third parties that install cookies through its site and, therefore, not even the logic underlying the relative processing. Furthermore, it is not uncommon for the publisher and third parties to interfere with the role of concessionaires, making it very complex for the publisher to control the activities of all the parties involved.

This would also cause a general lack of clarity in the privacy notice issued by the publisher, while at the same time making it extremely difficult for the user to read the document and therefore to understand the information contained therein, thereby also ruining the simplification intent envisaged by the Art. 122 Privacy Code.

How do cookies work and how can they be eliminated?

Each user can set the browser of his terminal in such a way that it accepts / rejects all cookies or displays a warning whenever a cookie is proposed, in order to be able to evaluate whether to accept it or not.

The user is enabled, however, to modify the default configuration (by default) and disable cookies (i.e. block them definitively), setting the highest level of protection.

The ways to block or delete cookies from your device vary depending on the type of terminal and depending on the type of browser used.

If is used a fixed device (pc, laptop, notebook, netbook and similar) it is needed to change the browser settings:

- Internet explorer [guide: <http://windows.microsoft.com/it-it/windows7/block-enable-or-allow-cookies>]
- Chrome [guide: <https://support.google.com/chrome/answer/95647?hl=it>]
- Firefox [guide: <https://support.mozilla.org/it/kb/Bloccare%20i%20cookie>]
- Safari [guide: <https://support.apple.com/it-it/HT201265>]

If it is used a mobile device (smartphone or tablet) it is needed to change the settings of the terminal:

- Apple [guide: <https://support.apple.com/it-it/HT201265>]
- Android [guide: <https://support.google.com/chrome/answer/95647?hl=it>]
- Blackberries
[guide: http://docs.blackberry.com/en/smartphone_users/deliverables/32004/Turn_off_cookies_in_the_browser_60_1072866_11.jsp].

For further information, please consult the guide prepared by Google and available at the link: <https://www.cookiechoices.org/>

What types and categories of cookies does the University use on the Site and for what purposes?

This Site uses functional and analytical cookies.

Functional cookies allow the site to remember the user's choices in order to allow easier navigation.

The data acquired through the technical analytical cookies are processed in an aggregate way, and therefore anonymous, in order to understand which are the most visited pages of the Site and, more generally, the way of use of the same. In particular, the Site uses:

Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google uses Personal Data collected for the purpose of tracking and examining the use of this Site, compiling reports and sharing them with other services developed by Google.

Google may use Personal Data to contextualize and personalize ads of its own advertising network.

Personal Data collected: Cookies and Browsing Data.

Place of processing: USA – [Privacy Policy](#) – [Opt Out](#)

Additional types of cookies present

Interaction with external social networks and platforms

Interaction services with social networks and external platforms allow interaction with social networks, or with other external platforms, directly from the pages of the Site. The interactions and information acquired from the Site are in any case subject to the user's privacy settings related to each social network. In the case in which an interaction service with social networks is installed, it is possible that, even if users do not use the service, it collects traffic data relating to the pages in which it is installed.

Like button and Facebook social widgets (Facebook, Inc.)

The "Like" button and Facebook social widgets are interaction services with the Facebook social network, provided by Facebook, Inc.

Personal data collected: cookies and usage data.

Place of processing: USA - [Privacy Policy](#)

Tweet button and Twitter social widgets (Twitter, Inc.)

The Tweet button and Twitter social widgets are interaction services with the Twitter social network, provided by Twitter, Inc.

Personal data collected: cookies and usage data.

Place of processing: USA - [Privacy Policy](#)

Instagram social widgets (Instagram, Inc.)

Instagram social widgets are services of interaction with the social network Instagram, provided by Instagram, Inc.

Personal data collected: cookies and usage data.

Place of processing: USA - [Privacy Policy](#)

Displaying content from external platforms

Content viewing services from external platforms allow to view content hosted on external platforms directly from the pages of this Site and to interact with them.

If a service of this type is installed, it is possible that, even if users do not use the service, it collects traffic data relating to the pages in which it is installed.

Youtube Video Widget (Google Inc.)

Youtube is a video content visualization service managed by Google Inc. that allows this site to integrate such content within its pages.

Personal data collected: cookies and usage data.

Place of processing: USA - [Privacy Policy](#)

Cookie Policy Changes

University reserves the right to change this cookie policy at any time. It is suggested to check at the end of the document, the "Last revision date" to verify when the last update dates.

Any change in this policy will take effect from the date of publication on the Site.

Date of the last revision 12 of June, 2018