Information on the processing of Personal Data based on Art. 13 reg. (EU) 2016/679

In accordance with the principle of transparency, the following information is intended to make the student aware of the characteristics and methods of data processing based on the new European Reg. 2016/679 (General Data Protection Regulation – G.D.P.R.):

- a) Identity and contact details: The "holder" of Personal Data is: Lorenzo de' Medici S.r.L. (company data); Legal representative: Mrs. Carla Guarducci; Address: Florence, Via Faenza 43, cap: 50123; Florence; Italy; phone: +39 055 287203; email amministrazione@lorenzodemedici.it; certified e-mail: lorenzodemedici@legalmail.it
- b) Contact details of the person in charge of protection of Personal Data (D.P.O.): Lorenzo de' Medici S.r..L. according to Art. 37 G.D.P.R. has designated as responsible for the processing of personal data (Data Protection Officer) Advocate Jacopo Corti A lawyer registered with the Florence Bar Association who can be contacted through the following channels: Address: Via G. Fabroni 9, Florence, Italy; email: jacopo@studiolegalecorti.it; certified email: jacopo.corti@firenze.pecavvocati.it; telephone: +39055 / 490.980.
- c) Purpose of the processing, legal basis and legitimate interests:

The processing of Personal Data is carried out exclusively for the following purpose:

* Execution of the relationship between Lorenzo de' Medici S.r.L and the student for the development of the student's academic path and their stay in Italy.

The legal basis that makes the processing of Personal Data by Lorenzo de' Medici S.r.L. lawful are: i) the need to execute the relationship based on Art.6, Par. 1 Lett. b) G.D.P.R. and ii) consent to the processing of Personal Data provided by the student with their signed acknowledgement included in the application form. This signed acknowledgement is necessary in order to make the service offered by Lorenzo de' Medici S.r.L prolific, advantageous and adequate. The consent provided by the student follows the principles established by Art. 6 G.D.P.R; namely that it is free, specific, informed, unequivocal, explicit, verifiable, revocable.

The processing is necessary for the pursuit of the legitimate interests of the data controller to comply with the relationship obligations signed between the parties.

The voluntary completion of the application form by the student with their Personal Data, together with the signing and submission of the application form, is explicit consent from the student for the data processing by Lorenzo de' Medici S.r.L.

d) Categories of recipients of Personal Data:

The data are processed by Lorenzo de' Medici S.r.L., exclusively from parties authorized by the data controller, under his responsibility and for the purposes set out above.

Every authorized subject has signed a specific declaration of confidentiality.

e) Transfer of data to the student's University and/or Service Provider:

Lorenzo de' Medici S.r.L will transfer, where necessary, the data to the student's University and/or Service Provider.

Legitimacy is based on Art. 49, Par. 1, Letter b) G.D.P.R. The data will be communicated exclusively to the subjects that have stipulated specific agreements, conventions or protocols with the data controller. For this kind of transfer, Lorenzo de' Medici S.r.L will use appropriate guarantees.

The student can always request a copy of such data or the place where they were made available.

f) Conservation period of Personal Data

The data will be kept for the period necessary to reach the purpose, as indicated in point c) of this information of processing data.

The conservation of Personal Data is derived from two needs: 1-to ensure the student's regular academic path and stay in Italy; 2- To comply with Italian and EU laws (mainly for administrative and fiscal purposes).

The data will be kept with the most appropriate and modern tools.

- g) <u>Data rights</u>: with reference to Personal Data, the following rights may be exercised by the data <u>subject</u>:
- 1. right to access your Personal Data; right to obtain rectification or cancellation.

Right to limit the processing of personal data;

- 2. right to oppose the treatment;
- 3. right to portability (law applicable only for electronical data format), based on Art. 20 G.D.P.R. Lorenzo de' Medici S.r.L informs you that part of the data processing is based on the principles set out in chapter II of the G.D.P.R, in particular Article 6 (1) (a) or Article 9 (2) (a).

For the execution of rights, the individual concerned can write (even if only for clarification) to Lorenzo de' Medici's D.P.O. ,Avv. Jacopo Corti, at the following email addresses: jacopo.corti@firenze.pecavvocati.it; tel. 055/490 980; fax. 055/473 523.

h) <u>Complaint:</u> The student has the right to complain with the supervisory authority and can contact the person responsible for data protection at the addresses indicated above. For more information, see the institutional site of the Control Authority designated by the Italian Republic, or the Privacy Guarantor www.garanteprivacy.it

i) Communication of data:

The communication of Personal Data, in the case concerning the relationship between the student and Lorenzo dé Medici S.r.L., is a necessary requirement for the conclusion of a contract.

j) Provision of data:

The provision of data from the student to Lorenzo de Medici S.r.L., is a necessary requirement for the conclusion of their relationship during the academic period of the student and their stay in Italy. Failure to provide the necessary data by the interested party may not allow the holder to proceed with the full completion of procedures and, moreover, may not guarantee the provision of the services expected therein in the best possible way.

k) Different purposes of processing:

If Lorenzo de' Medici S.r.L intends to process the Personal Data for a different purpose compared to point c) it will provide the data subject with information on this different purpose and any other relevant information.

1)Profiling:

The holder, limited to the purpose for which the data are issued, will use automated profiling processes.

This procedure is necessary in order to conclude and execute the relationship between Lorenzo de' Medici S.r.L and the student, according to article 22, paragraph 2, letter a) G.D.P.R.

The student, with the signing of the application form, declares to have seen, read and received a copy of this information in English.

Furthermore, the student declares to have read and understood this "Privacy Policy," in its entirety, consisting of three pages and gives explicit authorization to Lorenzo de' Medici S.r.L for the processing of their Personal Data.

For Personal Data in accordance with Art.4, Par.1, Lett. a) G.D.P.R refers to: "any information concerning an identified or identifiable natural person ("concerned"), identifying the natural person who can be identified, directly or indirectly, with particular reference to an identifier such as the name, a number of identification, location data, an online identifier or one or more characteristic elements of its physical, physiological, genetic, psychological, economic, cultural or social identity."