



## DATA PROCESSING POLICY

Pursuant to Articles 13 and 14 of EU Regulation No. 679/2016 of April 27, 2016 "General Data Protection Regulation" (hereinafter referred to as "Regulation") and Legislative Decree No. 196/2003 "Personal Data Protection Code", as amended by Legislative Decree No. 101 of August 10, 2018, containing provisions for the adaptation of the national system to the European Regulation

Data controller	Sapienza University of Rome in the person of its legal representative with pro tempore legal domicile in Piazzale Aldo Moro 5, 00185 - Roma  Contact details: Email: <a href="mailto:rettricesapienza@uniroma1.it">rettricesapienza@uniroma1.it</a> PEC: <a href="mailto:protocollosapienza@cert.uniroma1.it">protocollosapienza@cert.uniroma1.it</a>
Data Protection Officer	Contact details: Email: <a href="mailto:responsabileprotezionedati@uniroma1.it">responsabileprotezionedati@uniroma1.it</a> PEC: <a href="mailto:rpd@cert.uniroma1.it">rpd@cert.uniroma1.it</a>
Manager/Facility Representative	Director of Property, Assets and Sustainability Area
Legal basis for processing	Under Article 6(c) and (e) of EU Regulation No. 679/2016
Purpose of processing description	The data is processed by the Unit for Italian and International University Residences and Guesthouses (Property, Assets and Sustainability Area – Real Estate Office) and by MEIT Multiservices srl in order to: <ul style="list-style-type: none"><li>• manage the guesthouse service</li><li>• communicate the guest's data to the <i>Questura</i> (Police Headquarters) in accordance with the law in force.</li></ul> The data will be used exclusively for the institutional purposes provided for, within the provisions of laws, regulations or contractual rules.
Nature of personal data strictly necessary to pursue the described purpose	Common personal data: name and surname, <i>codice fiscale</i> , email address, telephone number, address, job title and payment identification code generated by the PagoPA system.



Information, consent and consequences of refusal	Consent to the processing of personal data is not required for the performance of the activities described above. You may refuse to provide some or all of the data requested, but refusal may make it impossible to use the service and to comply with legal obligations.
Archiving and conservation	<p>Data will be kept for the duration of the requested and authorised stay and thereafter for a period not exceeding the statutory limitation period and in accordance with national and European legislation (General Data Protection Regulation (EU)).</p> <p>The management and storage of personal data collected for the purposes described in this information sheet will take place on servers located within the University and on external servers of suppliers of certain services required for technical-administrative management, who have been duly appointed as external Data Processors in accordance with Article 28 of the GDPR, for the sole purpose of providing the requested service. In particular, the company MEIT Multiservices srl, which manages the guesthouse service, has been appointed as an external data processor.</p>
Notes on the data subject's right	Please note that the data subject may request from the Data , under the relevant conditions, access to personal data pursuant to art. 15 of the Regulation, rectification of the same under art. 16 of the Regulation, cancellation of the same pursuant to art. 17 of the Regulation (where this does not conflict with current legislation on data retention and with the need to protect, in the event of litigation, the University and the professionals who have processed the data) or limitation of the processing pursuant to art. 18 of the Regulation, or he/she/they may oppose their processing under art. 21 of the Regulation, in addition to being able to exercise the right to data portability pursuant to art. 20 of the Regulation.
Procedures for the exercise of rights and complaints to the Data Protection Authority	Notwithstanding the above, the data subject may exercise his/her/their rights pursuant to Articles 15-22 of the GDPR by using the contact details indicated on page 1 of this information note. For further information, please refer to the <i>Vademecum per l'esercizio dei diritti</i> published, in Italian, at <a href="https://www.uniroma1.it/it/pagina/settore-privacy">https://www.uniroma1.it/it/pagina/settore-privacy</a> , in the specific section " <i>Esercizio dei diritti in materia di protezione dei dati personali</i> ".



	<p>In case of violation, you also have the right to lodge a complaint with the supervisory authority pursuant to Article 77 of the Regulation. In Italy, this function is performed by the <i>Garante per la Protezione dei dati personali</i> (<a href="https://www.garanteprivacy.it">https://www.garanteprivacy.it</a>).</p>
Interested parties	<p>Reservation holders, guests and accompanying persons using the service.</p>
Recipients	<p>The processing of the requested data will be carried out by internal staff of the University (belonging to the Property, Assets and Sustainability Area) - identified and authorised to process the data - as well as by the external data processor pursuant to article 28 of the GDPR, identified and appointed for this purpose, currently MEIT Multiservices srl, a company entrusted with the management of the "Luca Serianni" (formerly Regina Elena) University Residence.</p> <p>In addition, the data may be communicated to external subjects who are entitled to receive it, such as legal and/or public safety authorities.</p>
Communication and transfer of data abroad	<p>Data is not disclosed abroad.</p>