PRIVATE POLICY ON THE PROCESSING OF STUDENTS PERSONAL DATA

in accordance with Article 13 of Regulation (EU) 2016/679

1. Data Controller

The Data Controller is Accademia di Belle Arti di Venezia, with its registered office in Dorsoduro 423, 30123 Venice (VE). Data Controller's contact details are: Phone 041 241 3752 and E-mail info@accademiavenezia.it

2. Data Protection Officer

The Academy has appointed the Data Protection Officer, who can be contacted by writing to the e-mail address dpo@accademiavenezia.it

3. Sources and types of data

The Academy processes the personal data provided by the data subject during registration, pre-registration, matriculation and enrollment in courses of study, specialization, masters and any other course of education or professional training activated at the Academy, even after the achievement of any final title. Personal data, that can be processed exclusively for the purposes indicated in point 4, are: a) personal data like name, surname, date of birth, contact, residence, career related data, participation in educational activities (presence on the day, place and time), relating to qualifications owned and on income conditions; b) navigation data when using platforms and online services; c) images and video footage for example during the distance learning activity; d) special categories of personal data (for example, data relating to health, racial and ethnic origin, orientation sexual) whose treatment is carried out only if authorized by express provision of the law, for the pursuit of purposes of significant public interest, or by express consent from the interested party contextually to the emergence of contingent needs (such as, for example, a possible injury); e) data relating to criminal convictions and offenses.

4. Purpose and legal basis of the processing

The Data Controller processes data for purposes related to the performance of its institutional duties towards the student, in particular the management of the academic career and provision of services such as: a) management of admission procedures to study courses; b) pre-enrollment and enrollment for access to study courses and enrollment in educational activities however named; c) management of the academic career, including the attainment of the qualification and any other final certificate; d) communications relating to administrative practices; e) calculation of the amounts of taxes due and in general use of economic benefits; f) management of inclusion services for students with specific disabilities; g) international mobility; h) possible participation in research projects or other institutional activities of the Academy; i) management of procedures related to the elections of student representatives and for their eventual performance the duties related to the elective office held by the interested party in the bodies of the Academy; j) management of disciplinary proceedings against students; k) use of the information, telematic and e-mail services provided by the Academy; l) organization of didactics, even at a distance, of exams and examinations for obtaining the title of study and any other final certificate and attendance record; m) use of library services; n) access to laboratories and other protected structures; o) activation and management of curricular and extra-curricular internships also at affiliated institutions; p) video surveillance of the Academic facilities; q) management of practices relating to claims; r) checking the truth of the self-certifications made pursuant to the D.P.R. n. 445/2000; s) statistical surveys carried out within the Academy in order to improve student services and assistance o in order to improve the teaching activity; t) archiving in the public interest, scientific or historical research or for statistical purposes. Other institutional purposes such as: a) disclosure of the training offer and information and cultural events organized or sponsored from the Academy or from the teaching and research facilities; b) incoming orientation, mentoring and outgoing orientation activities, activities aimed at inclusion in the world of work (job placement), also through communication of data to private and public entities and an inter-academic consortia for exclusive occupational or professional purposes; c) communication and management of initiatives aimed at awarding grants, prizes, honors and events of public interest, also through the data communication to public and private subjects.

The legal basis of the aforementioned treatments is represented by art. 6.1.e) of the Regulation ("processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller "), in general for personal data, and by art. 9.2. g) ("reasons of substantial public interest") of the Regulations and art. 2-sexies, paragraph 2, lett. bb), of d. lgs. n. 196/2003, for special categories of personal data.

5. Processing methods

The data processing is carried out in such a way as to guarantee security and confidentiality, using tools and suitable paper, eligible electronic devices, adopting appropriate technical and administrative security measures to reduce the risk of loss, misuse, unauthorized access, disclosure and tampering with data. The personal e-mail address, the telephone contact eventually communicated by the data subject concerned and the institutional email address, assigned at the time of enrollment or registration, are the means through which all communications and related information will be sent career management and the pursuit of all the purposes indicated in point 4. Processing is excluded automated decision-making of personal data acquired, including profiling.

6. Recipients of personal data and categories of recipients

For the above purposes, in addition to the employees and collaborators of the Academy, who act as authorized to process on the basis of specific instructions provided regarding the purposes and methods of processing itself, even those who offer services to
the Academy may process personal data instrumental or accessories strictly connected to the institutional activities of the Academy, which may act a as appropriate as independent Data Controllers, Joint Controllers or Data Processors appointed for this purpose. Personal data may also be disclosed to other third parties when the communication results necessary for the performance of the institutional functions of the Academy or in fulfillment of legal obligations and contractual, specific requests of the interested party, management of any complaints or disputes and for the prevention and repression of fraud and any illegal activity.

7. **Data retention period**

Personal data are kept for the entire period necessary to carry out the purposes indicated in point 4, in accordance with the provisions of current legislation for the period necessary to comply with the legal obligations and management - administrative needs.

8. **Data provisioning**

The personal data provisioning for the purposes indicated in point 4 is essential for the establishment and management of the relationship between the data subject and the Academy, for the provision of services and for the fulfillment of the related legal obligations.

9. **Transfer of data to third countries and / or international organizations**

Personal data may be transferred to consular offices, embassies and abroad, in strict compliance with the provisions of the Regulation, even in countries outside the European Union when this is the case necessary for the management of international mobility student programs. The transfer to countries outside the EU, in addition to cases in which this is guaranteed by adequacy decisions of the European Commission, is carried out in such a way as to provide appropriate and appropriate guarantees pursuant to articles 46 or 47 or 49 of Regulation.

10. **Data subject rights and how to exercise them**

As a data subject, you have the right to obtain from the Academy, in the cases provided for by the Regulation, access to personal data, the correction, integration and cancellation of the data or the limitation of data processing or to object of the data processing itself (Article 15 and following articles of the Regulation). The request can be submitted by contacting the Data Protection Officer directly at dpo@accademiavenezia.it or by sending a communication to the Data Controller at the contact details mentioned in point 1.

Users who believe that the processing of their personal data is in violation of the provisions of the Regulation also have the right to file a complaint with the Data Protection Authority (Garante per la Protezione dei Dati Personalii), as per article 77 of the Regulation, or to take pursue action through the appropriate judicial offices (Article 79 of the Regulation).