

Privacy Policy

Università Telematica "Giustino Fortunato"

The "Giustino Fortunato" Telematic University, established and operating in compliance with Italian law, recognizes the importance of the privacy of the users of its websites and is committed to respecting it with reference to the new regulation on the protection of personal data no. 2016/679.

With this privacy policy (hereinafter, "Privacy Policy") referring to the website www.unifortunato.eu (hereinafter the "Site"), the non-state Telematic University "Giustino Fortunato" intends to provide users with information regarding the data controller, the personal information collected through the Site, the purposes and methods for which such information is processed, the third parties involved in the processing, any transfer abroad, the security measures adopted to protect and safeguard the data collected, and the ways in which the user can verify the processing of data concerning them and exercise the rights recognized by the European Regulation on the protection of personal data no. 2016/679 (hereinafter referred to as the GDPR), as well as the applicable national legislation.

The Privacy Policy has been drafted in compliance with the GDPR and also represents the notice to data subjects pursuant to Article 13 of the GDPR, as well as the applicable national legislation.

The Privacy Policy applies only to the Site and not to any other websites that the user may visit through links present on the Site.

TYPES OF PERSONAL DATA COLLECTED AND PROCESSED

Browsing data

When visiting and consulting the Site, the "Giustino Fortunato" Telematic University generally does not collect personal data from the user, with the exception of so-called browsing data. The technological platform through which the Site is made available to the user automatically records certain browsing data — the transmission of which is implicit in the use of Internet communication protocols — such as, for example, the name of the Internet access provider, the originating site, the pages visited, the date and duration of the visit, etc. This information allows access to the Site and the use of certain services, and may be used in anonymous and aggregate form for statistical purposes and to verify the correct functioning of the Site.

The "Giustino Fortunato" University does not collect this data in order to associate it with other information about users or to subsequently identify users; however, by their very nature, such data could allow user identification following processing and association with other information. Browsing data may therefore be used by the University to establish liability in connection with any computer crimes committed to the detriment of the Site or through the Site. Except for this eventuality, the browsing data described above is retained for the minimum period required by applicable law.

Data voluntarily provided by the user

The "Giustino Fortunato" Telematic University collects and processes personal data that the user voluntarily provides when interacting with the Site's features and services — for example, when registering to learn about University news, new active courses, requesting CFU (credit) evaluations, receiving newsletters and other commercial communications, as well as when submitting spontaneous applications or requesting information or sending communications to the university. In the sections of the Site where personal data is collected, a notice drafted pursuant to Article 13 of the GDPR is published, and specific consent to the processing of the data provided in those sections is required, in compliance with the aforementioned Regulation.

Optional nature of data provision

Aside from what is specified for browsing data, the user is free to provide the personal data requested in the registration forms for the services of the website www.unifortunato.eu, for requests for information, suggestions and reports to the site's editorial staff, or otherwise indicated in telephone contacts.

Failure to provide such data may make it impossible to obtain what was requested.

PURPOSES OF PROCESSING

The non-state Telematic University "Giustino Fortunato" processes user data for the following purposes:

- management of registration to the Site and operational management of navigation on the Site;
- management of Site security;
- market research and statistical analysis;
- personnel search and selection;
- compliance with legal and regulatory obligations;
- exercise of rights in judicial proceedings.

PROFILING

The "Giustino Fortunato" University may process, subject to your consent, personal data provided spontaneously and data acquired during the use of the service(s) offered, for automated and/or manual analysis activities aimed at identifying your preferences, choices and commercial habits, in order to improve the services provided and to propose commercial offers deemed to be of greater interest to you. Profiling activity is carried out using the VTIGER software.

DATA RETENTION PERIOD

Personal data provided by users will be retained for the entire period of use of the service. After a request for cancellation from the service, the data will be retained for a further period of 30 days. After this period has elapsed, the data will be permanently deleted.

PLACE OF DATA PROCESSING

Data processing connected with the web services of this site is carried out by the Giustino Fortunato University. The data is managed and stored on servers located within national territory. A backup copy is also maintained on Aruba servers, likewise located in Italy.

Data collected through the web service is not subject to communication or disclosure, except in cases expressly provided for by current legislation.

TRANSFER OF DATA ABROAD

Pursuant to Article 45 of the GDPR, the transfer of personal data may take place to a third country or an international organization if the Commission has decided that the third country or international organization in question ensures an adequate level of protection, or provides other adequate safeguards under the GDPR. Such transfer will occur in the event that the student decides to participate in Erasmus programs, training courses abroad, etc.

NATURE OF DATA PROVISION

With the exception of browsing data (automatically collected by the system), the provision of data by the user for the purposes indicated above is optional. Any failure to provide data for marketing purposes will have no consequence on your ability to access the features offered by the Site, except for the impossibility of using services strictly connected to registration. Any failure to provide data for profiling purposes will have no consequence on your ability to access the features offered by the Site.

METHODS OF PROCESSING

The user's personal data is processed using IT and telematic methods, predominantly through electronic and automated means and, to a limited extent for particular operations, on paper.

In compliance with Article 32 of the GDPR, specific security measures are observed to prevent data loss, unlawful or incorrect use, and unauthorized access.

PARTIES INVOLVED IN THE PROCESSING

The user's personal data is processed by parties designated as data processors or authorized personnel, in accordance with the provisions of Articles 12 and 28 of the GDPR.

The data may be disclosed to other third parties such as professionals, consultants and, more generally, third parties who cooperate with the "Giustino Fortunato" Telematic University in pursuing the purposes indicated above, or third parties entrusted with activities under outsourcing arrangements.

In any case, the "Giustino Fortunato" Telematic University undertakes to provide such third parties only with the data necessary for carrying out the functions and activities entrusted to them; it also undertakes to do everything possible to ensure that third parties use the data received only for the purposes indicated by the university and in compliance with applicable personal data protection legislation.

The user's personal data may also be disclosed to third-party companies in the event of merger or demerger, acquisitions, transfer of the business or a branch of the business, or other extraordinary corporate transactions.

The user's personal data may also be disclosed to legitimate recipients pursuant to law or regulation, for example in the event of a request from competent public authorities and the judicial authority or, more generally, in the context of judicial proceedings, as well as to protect and defend the Site and the rights of the non-state Telematic University "Giustino Fortunato".

Such parties will process the data either as autonomous data controllers or as data processors, depending on the case.

The updated list of all Data Processors may be requested from the Data Controller identified below, at the email address privacy@unifortunato.eu.

The Data will not be disclosed to the public.

LINKS TO THIRD-PARTY SITES AND SERVICES

The Site, or other messages and communications sent by the non-state Telematic University "Giustino Fortunato" to the user, may contain banners, advertising messages and listings from third parties or the Data Controller's commercial partners.

By responding to the offers of these third parties, the user may access multimedia pages exclusively belonging to such third parties, which, being outside the Data Controller's control, are in no way bound to comply with the provisions of this Privacy Policy.

The non-state Telematic University "Giustino Fortunato" therefore invites users to exercise caution when using services offered by third parties and to read the notices provided by the third party regarding the processing of personal data carried out by them, over which the Data Controller has no control and for which it cannot be held responsible.

CHANGES TO THIS DOCUMENT

This Privacy Policy may be modified to comply with new legal provisions, changes in the way data is processed by the non-state Telematic University "Giustino Fortunato", or due to changes relating to the operation of the Site or the provision of services offered through it.

The non-state Telematic University "Giustino Fortunato" will promptly communicate any update by publishing it in this section of the Site. The University therefore invites users to periodically consult the Privacy Policy to ensure they are viewing the latest published version.

DATA CONTROLLER

The Data Controller is the non-state University "Giustino Fortunato", with registered office in Benevento, Via Delcogliano no. 12.

DATA PROTECTION OFFICER

A Data Protection Officer, whose duties are set out under Article 39 of the GDPR, has been appointed. The DPO can be contacted by writing an email to privacy@unifortunato.eu, or by sending a registered letter with return receipt to the registered office of the non-state University "Giustino Fortunato", addressed to the attention of the DPO.

RIGHTS OF DATA SUBJECTS

Data subjects have the right at any time to obtain confirmation from the data controller as to whether or not personal data concerning them is being processed and, if so, to obtain: the right to withdraw consent to the processing of personal data (Art. 7(3) GDPR), access to personal data and related information (Art. 15 GDPR), the right to rectification (Art. 16 GDPR), the right to erasure (Art. 17 GDPR), the right to restriction of processing (Art. 18 GDPR), the right to data portability (Art. 20 GDPR), and the right to object (Art. 21 GDPR), as well as the right not to be subject to a decision based solely on automated processing, including profiling (Art. 22 GDPR).

Requests should be addressed:

by email, to: privacy@unifortunato.eu

or by post, to: Università "Giustino Fortunato", registered office in Benevento, Via Delcogliano no. 12.

RIGHT TO LODGE A COMPLAINT

A data subject who believes that the processing of personal data concerning them violates the GDPR has the right to lodge a complaint pursuant to Art. 77 of the GDPR with a supervisory authority, specifically in the Member State where they habitually reside, work, or where the alleged violation occurred.

