

In accordance with the provisions of the new EU Regulation No. 679/2016 on processing personal data, "GDPR" (General Data Protection Regulation), which took effect on May 25, 2018, the personal data you provide to the Collegio Universitario Luciano Fonda (hereafter referred to as Luciano Fonda University College or The College) will be processed in accordance with the principles of lawfulness, fairness, and transparency, ensuring the protection of privacy and the rights of data subjects.

The processing of data is conducted in accordance with the terms and conditions of this notice. It provides relevant information about the methods and purposes of personal data processing and outlines your rights.

The notice governs the use of personal data collected through various means, including our website, enrollment forms, and other data collection methods.

1- DATA CONTROLLER

The data controller is the Luciano Fonda University College. The contact email for communications is info@collegiofonda.it. The data processing manager is the Legal Representative.

2- TYPES OF COLLECTED DATA

The collected data includes:

- **Contact information**: name and surname, address of domicile and residence, telephone numbers, email address, name and surname of a family member, and their contact details.
- **Identification data**: place and date of birth, tax code, identity document number, issue and expiry date.
- Payment data: bank details or credit card information.
- Academic and educational career information: qualifications, certificates, educational and professional history.
- Professional career information of trainers, collaborators, and employees: qualifications, publications, educational and professional history.
- **Economic situation information**: ISEE, income from occasional self-employment, enrollment in mandatory pension schemes.
- **Health data**: medical certificates for specific needs or special requirements.
- Access and usage data: IP addresses, browsing data on our website, cookies, and tracking tools defined in a specific cookie policy.
- Personal images: photos and videos.
- Other information that may be communicated to or requested by the College.

3- PURPOSES AND LEGAL BASIS FOR DATA PROCESSING

1. The collected personal data will be used, processed, and stored for the following purposes:



- 2. Communications: sharing information about College admissions, residential services, events sponsored by the College, updates, and newsletters. The email address you provide may be collected and used by the data controller or authorized parties to notify you about activities promoted by the College. Your consent is necessary for us to process your data for this purpose.
- 3. Evaluation of applicants and communication transmission. The processing of your personal data for these purposes does not require your consent, as providing such data is a necessary part of participating in the selection process for admission to Luciano Fonda University College. Failure to provide the requested data will prevent progress in the selection process.
- 4. **Contractual stipulation**: contract with the College, accommodation contract, and signing of the Learning Agreement (and/or General Regulations). Using your data for these activities does not require your consent, as refusal to provide the data would prevent admission to the Luciano Fonda University College.
- 5. **Provision of educational services**: managing registrations, attendance/absences to monitor compliance with the educational agreement, organizing events, and issuing certificates and diplomas. Personal data and student career information will be used for activities the College maintains with the University of Trieste and the Ministry of University and Research (MUR).
- 6. **Provision of residential services**: assignment and management of accommodation services.
- 7. **Administrative accounting management**: billing, payment management, accounting, tax obligations. Your consent is necessary to process your data for this purpose.
- 8. **Promotional activities**: your data, as well as images and comments featuring you, may be published or disseminated, reproduced within College's website or on social networks or any other means of communication (print) free of charge. The data controller may only process such after your consent is expressed.
- 9. **Security and fraud prevention**: protecting our networks and your data.
- 10. Improvement and customization of services: analyzing educational needs, evaluating course quality, statistical, promotional, or historical or scientific research purposes, recognition and accreditation of the College with the MUR. You must express your consent when it is necessary to know and process sensitive data for such activities.
- 11. Compliance with legal obligations.

We process your data based on the following legal bases:

1. **Execution of a contract**: to provide residential and educational services.



- 2. **Consent**: for specific promotional activities or treatments not necessary to execute the contract.
- 3. **Legal obligation**: to fulfill tax, accounting, and legal obligations.
- 4. Legitimate interest: to improve our services and ensure security.

4. DATA PROCESSING METHODS

Data processing will occur at the operational offices of Luciano Fonda University College and any other locations where the involved parties are based. Processing will utilize both electronic and non-electronic methods, respecting fundamental freedoms and safeguarding your privacy, guided by principles of transparency and fairness. It will be conducted solely for the purposes related to the stated objectives. Data will be stored at the operational headquarters of the College, located at the former military hospital, Via Fabio Severo 40, Trieste. Electronic storage will take place on secure servers within controlled access areas. Data will be processed to maintain confidentiality and integrity, with suitable security measures implemented to prevent damage, loss, unlawful or improper use, and unauthorized access.

5. DATA COMMUNICATION AND DISSEMINATION

Data provided to the College may be shared, solely for the purposes of the requested and necessary professional services, with professionals, service providers, or entities entrusted with specific activities on behalf of the College. In particular, such data may be shared with employees acting as data processors, with ARDiS staff and their collaborators (such as IdealService) for matters related to accommodation, and with companies providing telematic, IT, educational, communication, administrative, accounting, tax, and social security services, in their capacity as data processors. Data may also be shared with the University of Trieste and the Ministry of Universities and Research (MUR). Personal data will not be disclosed to any other parties unless required by specific legal obligations.

6. DATA RETENTION PERIOD

Data will be retained for as long as necessary for the correct and complete execution of the collaboration contract or for the purposes for which legal obligations collect them. Once the contractual term has expired or once the requested services have been provided, the data will be destroyed or anonymized per the technical procedures for deletion and backup. Such data will be retained for 24 (twenty-four) months.

7. PROVISION OF DATA

Providing personal data is optional. However, it is strictly necessary to complete and sign the admission form, the accommodation contract, and the Learning



Agreement (or General Regulations). It is only mandatory for data that are legally required (i.e., mandated by laws, regulations, or public authorities' provisions).

8. REFUSAL TO PROVIDE DATA

Any refusal by the data subject to provide personal data may prevent the College from delivering the services.

9. RIGHTS OF THE DATA SUBJECT

The data subject has the right to access their data at any time and to exercise the rights related to the processing of their data. Among these rights, they have the right:

- 1. to obtain confirmation of the existence or non-existence of data concerning them and to receive communication;
- 2. to know the origin of the data, the purposes of processing, and its methods, as well as the logic applied to processing carried out through electronic tools;
- 3. to obtain updates, rectifications, limitations of processing, or, when interested, the integration of data;
- 4. to obtain the deletion, transformation into an anonymous form, or blocking of data processed unlawfully;
- 5. to object at any time to the processing of their data in the presence of particular situations concerning them;
- 6. to revoke previously granted consent to the processing of their data without affecting the lawfulness of processing based on consent before revocation:
- 7. to obtain the portability of personal data concerning them;
- 8. to complain to the Italian supervisory authority (Data Protection Authority).

The exercise of rights may be done by sending a request to the email address info@collegiofonda.it.

10. COOKIE POLICY

This cookie policy was last updated on September 8, 2025, and applies to citizens and legal permanent residents of the European Economic Area and Switzerland.

For more details, we invite you to review our cookie policy on our website: https://www.collegiofonda.it.

Last modification: September 8, 2025



Acquisition of consent

| data, | ition regarding the processing of personal |
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| □ authorize □ do not authorize In the above terms, "Luciano Fonda" Universi personalize the services I received during my | · · · · · · · · · · · · · · · · · · · |
| □ authorize □ do not authorize The "Luciano Fonda" University College will or training agreement in the above terms. | nly handle my health data to monitor the |
| □ authorize □ do not authorize the "Luciano Fonda" University College to use charge, through the Internet channel (World pictures, and audiovisuals in which I appear as | Wide Web) and the Social Media, images, |
| Date | Signed |