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Privacy Notice on the Processing of Personal Data of Website Users – SAVE Project

1. Introduction

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 on the “protection of natural persons with regard to the processing of personal data” (hereinafter also referred to as the “GDPR”), we hereby provide you with information regarding the processing of personal data relating to you (“Data”) carried out by Università Cattolica del Sacro Cuore (hereinafter also the “University”) during navigation of the website <https://www.saveproject.it/> (the “Website”).

2. Identity and contact details of the Data Controller

The Data Controller of your Data is Università Cattolica del Sacro Cuore (hereinafter also the “Controller”), with registered office at Largo Agostino Gemelli 1, 20123 Milan, tel. (+39) 02 7234.1.

3. Navigation data

The information systems and software procedures used to operate the Website acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols (TCP/IP).

This information is not collected in order to be associated with identified data subjects, but by its very nature may, through processing and association with data held by third parties, allow users to be identified.

This category of data includes IP addresses or domain names of the computers used by users connecting to the Website, URI (Uniform Resource Identifier) addresses of requested resources, the time of the request, the method used to submit the request to the web server, the size of the file obtained in response, the numerical code indicating the status of the response provided by the web server (successful, error, etc.), and other parameters relating to the user’s operating system and IT environment.

4. Data provided by the user

You may be asked to provide personal Data relating to you (e.g. personal details, contact details) in order to allow the University to provide the requested services, such as requests for information about the SAVE Project. Furthermore, sending e-mail communications may involve the processing of additional personal data relating to you.

5. Cookies



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A cookie is a small text string sent to your browser and, if necessary, stored on your computer (or alternatively on your smartphone/tablet or any other device used to access the Internet); this generally occurs each time you visit a website. The University uses cookies for various purposes, in order to offer you a fast and secure digital experience, for example by allowing you to remain logged into protected areas while browsing the Website.

Cookies stored on your device cannot be used to retrieve data from your hard drive, transmit computer viruses, or identify and use your email address. Each cookie is unique to the browser and device used to access the University's Website. In general, cookies aim to improve website functionality and user experience.

5.1 What cookies are

The Website uses "cookie" technology together with other tracking tools (such as web beacons). Their use is mainly aimed at improving Website performance and facilitating and enhancing the User experience.

Cookies may be stored permanently or have a variable duration (so-called persistent cookies, for example to automate login procedures to restricted areas), or they may expire when the browser is closed or have a limited duration (so-called session cookies).

Cookies may be installed by the website being visited (first-party cookies) or by other websites (third-party cookies) and are used to perform IT authentication, session monitoring, and storage of information relating to user activity.

According to the guidelines issued by the Italian Data Protection Authority, cookies can be classified into two main categories:

- **Technical cookies**, used solely to transmit communications over an electronic communications network or to provide a service explicitly requested by the user;
- **Profiling cookies**, used to track specific actions or recurring behavioral patterns in order to create user profiles and send targeted advertising messages.

User consent is not required for the installation of technical cookies. Cookies may be installed directly by the Website operator or by third parties.

The Website exclusively uses the following types of first-party technical cookies:

- **Session cookies**, essential to allow users to browse the Website and use its services; they are not stored on the user's computer and disappear when the browser is closed;



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- **Functionality cookies**, used solely to improve and speed up browsing by storing user preferences (such as language selection).

The use of technical cookies does not require the user's prior consent.

For further information on cookies, users may visit www.youronlinechoices.com to learn how to manage or delete cookies depending on the browser used.

6. Purposes of processing and legal basis

Your Data may be processed for the following purposes:

- a. Ensuring access to and navigation of the Website, responding to information requests and/or sending documentation;
- b. Establishing liability in the event of cybercrimes against the Website or related websites;
- c. Compliance with European and/or national laws.

The legal basis for processing is:

1. For purpose (a), the performance of a contract or pre-contractual measures;
2. For purpose (b), the legitimate interest of the Controller;
3. For purpose (c), compliance with legal obligations.

Failure to provide Data will make it impossible for the University to pursue the above purposes.

7. Processing methods

Data processing is carried out using manual, IT and telematic tools, strictly related to the purposes and in compliance with applicable security and confidentiality regulations.

8. Data retention period

The University will process Data for the time strictly necessary to achieve the above purposes, without prejudice to longer retention periods required by law or regulations.

9. Categories of recipients

Your Data may be communicated to:

- Public or private bodies or competent authorities to comply with legal obligations;
- Companies providing IT maintenance and online services for the Website.



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Such recipients will process the Data either as Data Processors appointed by the Controller or as independent Data Controllers.

10. Transfer of data outside the EU

Data will not be transferred outside the EU. If such transfer occurs (e.g. cloud services), it will comply with applicable laws.

11. Data Protection Officer (DPO)

The University has appointed a Data Protection Officer, contactable at dpo@unicatt.it.

12. Data subject rights

You have the right to:

- Access, rectify, erase or restrict processing of your Data;
- Receive your Data in a structured, commonly used and machine-readable format and transmit it to another controller;
- Withdraw consent at any time;
- Lodge a complaint with the competent supervisory authority.

Rights may be exercised by contacting Università Cattolica del Sacro Cuore – General Management – Privacy, Largo Agostino Gemelli 1, 20123 Milan, or by email at dpo@unicatt.it.

Social Media Policy

Communication activities related to the SAVE Project are jointly managed by Università Cattolica del Sacro Cuore and Fondazione Don Gino Rigoldi.

Social media profiles and messaging services are managed by authorized personnel. Personal data processing follows the policies of the platforms used. Public comments containing personal data may be removed. Private messages will be processed in compliance with applicable data protection laws and this privacy policy.