Privacy Notice on the Processing of Personal Data (pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 – "GDPR")

This privacy notice aims to inform you about the processing of personal data relating to you that the Università Campus Bio-Medico di Roma (hereinafter "UCBM" or "Data Controller") intends to carry out in connection with your application for international mobility programs under the Transnational Project TNE 23-00079 "Health Technology: from capacity building to capacity strengthening – Afya Moja".

1. Data Controller

The Data Controller of your personal data is Università Campus Bio-Medico di Roma, with registered office in Rome, Via Álvaro del Portillo n. 21.

The Data Protection Officer (hereinafter "DPO") can be contacted at the following addresses:

- E-mail: dpo@unicampus.it
- Postal mail: Università Campus Bio-Medico di Roma, Via Álvaro del Portillo, n. 21, 00128 Rome, Italy, to the attention of the Data Protection Officer.

2. Categories and Types of Personal Data Processed

The Data Controller will process the personal data belonging to the category of common data provided by you in the context of the application procedure, such as identification data (e.g., name, surname, date and place of birth, nationality), contact details (e.g., email address, phone number), information related to your academic background and experience (e.g., curriculum vitae, enrollment certificate, list of exams, motivation letter, and possible references), data related to your identity document or passport and the information necessary for international mobility, as well as bank data (IBAN) for the payment of any financial contribution. Further information relevant to your application and the management of the international mobility program under the Transnational Project TNE 23-00079 "Health Technology: from capacity building to capacity strengthening – Afya Moja" (e.g., academic year, degree program or PhD course, and expected mobility period) may also be processed.

3. Purposes of Processing and Legal Bases

Your personal data will be processed for the following purposes:

a) To pursue the institutional activities of UCBM: the Data Controller will process your personal data to verify the eligibility requirements for the international mobility program within the Transnational Project TNE 23-00079 "Health Technology: from capacity building to capacity strengthening – Afya Moja", as well as for managing contacts, organizing educational and logistical activities, granting access to UCBM's services and facilities, and ensuring compliance with contractual and legal obligations related to the program.

UCBM will process common personal data for this purpose on the basis of Article 6(1)(e) GDPR (performance of a task carried out in the public interest).

Once provided, your personal data may also be processed for the following purposes:

- b) To comply with legal obligations or fulfill requests from competent Italian, European, or international authorities, based on Article 6(1)(c) GDPR for common personal data.
- c) To establish, exercise, or defend legal claims, on the basis of Article 6(1)(f) GDPR.

4. Methods of Data Processing

For the purposes indicated above, personal data will be processed using manual, electronic, and telematic tools, with logic strictly related to the purposes themselves and in such a way as to guarantee data minimization, security, and confidentiality, as well as compliance with specific legal obligations.

5. Recipients of Personal Data

Your personal data may be shared, for the purposes mentioned above, with the following recipients:

- i) Third parties acting as Data Processors, pursuant to Articles 4(8) and 28 GDPR, such as natural persons and/or companies and/or entities that provide technical, administrative, or management support services to UCBM (e.g., IT platform providers, system maintenance, archiving and storage services). The updated and complete list of data processors can be requested from the Data Controller at the contact details indicated in this privacy notice.
- ii) Entities, organizations, or authorities acting as independent Data Controllers, to which your personal data must be communicated for the performance of activities strictly related to the purposes mentioned above. In particular, your personal data may be communicated to universities and partner organizations of the Transnational Project TNE 23-00079 "Health Technology: from capacity building to capacity strengthening Afya Moja", including those located outside the European Economic Area (EEA); diplomatic and consular representations (Italian or foreign); banking institutions and insurance companies; as well as any other national or international authorities where required by law or for the proper management of the project.
- iii) Persons authorized by the Data Controller pursuant to Article 29 GDPR and Article 2-quaterdecies of the Italian Privacy Code, appointed to perform activities strictly related to the above purposes (e.g., administrative staff, faculty, collaborators, system administrators), who are bound by confidentiality obligations or subject to an adequate legal duty of confidentiality.

Further information is available from the Data Controller or the DPO at the contact details indicated above.

6. Transfer of Data to a Third Country or an International Organization

The Data Controller foresees that your personal data may be transferred to universities and partner entities located in non-EEA countries, whenever this is necessary for the management of mobility and the activities envisaged under the Transnational Project TNE 23-00079 "Health Technology: from capacity building to capacity strengthening – Afya Moja". Such transfers will take place in compliance with Chapter V of the GDPR and, in the absence of an adequacy decision pursuant to Article 45(3) GDPR, will be carried out on the basis of the derogations provided for in Article 49(1)(b) and (c) GDPR, as they are necessary for the performance of pre-contractual and contractual measures connected with international mobility, in compliance with the Recommendations 2/2020 of the European Data Protection Board. Further information is available from the Data Controller or the DPO at the contact details indicated above.

7. Data Retention Period

Your personal data will be stored only for as long as strictly necessary for the purposes for which they are collected, in compliance with the principles of data minimization and storage limitation under Article 5(1)(c) and (e) GDPR. The Data Controller may retain some data even after the termination of your relationship with UCBM, for as long as necessary to fulfill contractual and legal obligations, or for accounting and reporting purposes related to the project. Further retention may occur if required by applicable law.

8. Your Privacy Rights (Articles 15–22 GDPR)

Where applicable, you have the right to request from UCBM, at any time and where legally appropriate:

- Access to your personal data (and/or a copy thereof), as well as additional information on ongoing processing activities;
- The rectification or update of your personal data processed by UCBM, if incomplete or outdated;
- The erasure of your personal data from UCBM's databases, where you believe the processing is unnecessary or unlawful;
- The restriction of the processing of your personal data by UCBM, where you believe that your personal data are incorrect, unnecessary, or unlawfully processed, or where you have objected to their processing;
- The exercise of your right to data portability, i.e., to obtain in a structured, commonly used, and machine-readable format a copy of the personal data provided to UCBM concerning you, or to request its transmission to another Data Controller;
- To object to the processing of your personal data, using a legal basis relating to your particular situation, which you believe should prevent UCBM from processing your personal data;
- To withdraw, at any time, your previously given consent (where applicable), in an easy and accessible way.

Requests must be addressed in writing to the Data Controller or the DPO at the contact details indicated above.

9. Complaint to the Supervisory Authority

If you believe that the processing of your personal data carried out by the Data Controller violates the GDPR, you have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali), as provided for by Article 77 GDPR, or to take legal action under Article 79 GDPR.