

PRIVACY POLICY of the websites of the European University Institute

Updated on July 15, 2020

The European University Institute (EUI) is concerned with the protection of personal data of all those who access the contents of its websites or that register for any activity via its websites, including those of its departments, programmes, projects and service units. With this in mind, the EUI submits any data processing activity carried out within its different websites of those of its departments, programmes, projects or service units to the parameters established by this Privacy Policy.

The purpose of this Privacy Policy is to provide transparency to the data processing operations that are carried out by the EUI within its Internet webpages, including those of its departments, programmes, projects and service units, thus publicly establishing its commitment to the protection of privacy and of personal data of the users of its Internet webpages.

1) Our Institutional Mission

The aim of the EUI shall be to contribute, by its activities in the fields of higher education and research, to the development of the cultural and scientific heritage of Europe, as a whole and in its constituent parts. Its work shall also be concerned with the great movements and institutions, which characterize the history and development of Europe. It shall take into account Europe's cultural and linguistic pluralism and relations with cultures outside Europe (article 2 of the Convention setting up a European University Institute).

In pursuit of this purpose, studies, research, and courses are conducted and offered that may involve the need to process personal data.

However, it is important to clarify that the EUI only carries out the processing of personal data with the aim of achieving its institutional mission, which includes sending promotional information regarding new courses and activities developed by its different departments, programs, projects and service units (newsletters). It is important to emphasize that the EUI does not use personal data for any other reason unrelated to its institutional purposes.

2) Updates to our Privacy Policy

With the purposes of maintaining the commitment to the protection of personal data of the users of its websites updated, so that it is adequate to the technological and legal modifications that may occur, the EUI will perform, whenever necessary, updates in this Privacy Policy.

Therefore, it is recommended that users periodically visit this Privacy Policy.

In the event updates may imply modifications in the purposes of the data processing or that lead to the sharing or communication of data to third parties, it will be conveyed to data subjects in accordance with the provisions of the [EUI PRESIDENT DECISION No. 10/2019 of 18 February 2019 Regarding Data Protection at the European University Institute \(EUI Data Protection Policy\)](#). Furthermore, **where appropriate**, users will be required to consent to the processing for this other purpose or for the communication or sharing of data.

3) Definitions and Concepts

For an adequate understanding of the meaning of the words and expressions used in its Privacy Policy, the EUI has prepared this brief glossary to clarify some concepts, most of them already foreseen in the EUI Data Protection Policy:

- **Personal Data:** any information relating to identified or identifiable natural persons ('data subjects'); "identifiable persons" can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to their physical, physiological, genetic, mental, economic, cultural or social identity;
- **Sensitive Personal Data:** personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data, data concerning health and data relating to sexual orientation or activity;
- **Data Processing:** any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure,

- transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction;
- **Consent:** any freely given, specific, informed and unambiguous indication of agreement to personal data being processed;
 - **Personal data breach:** a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access to personal data transmitted, stored or otherwise processed;
 - **Cookies:** Internet files that store, for a certain period, information about the user's browsing on the internet.

4) The Processing of Personal Data

The EUI, whenever necessary for the performance of its institutional mission, may carry out activities that involve the processing of personal data, some of which may occur with the consent of the data subject while others, in cases where there is legal authorization, will occur regardless of consent.

5) Data Collection

When accessing the EUI websites, including those of its departments, programmes, projects and service units, certain information about the user will be stored, such as the internet protocol number (IP), the browser used, the operating system, the content accessed, how much time was spent on the website, and other similar information. These information may be collected using cookies.

The EUI also collects personal information when users fill out forms with the purposes of being sent newsletters and/or other informative content, registering to events (eg. courses, conferences and training activities) or when free material is downloaded.

Additionally, in cases where the actual contracting of its courses, publications, studies, and training activities occur, the EUI will collect additional personal data for the services rendered, such as: Tax code number, e-mail address, billing address, contact number etc. These additional personal data are processed solely for the purpose of making the provision of these activities/services possible.

The EUI also collects personal data through its own applications, which are governed by specific privacy policies, as well as through third-party applications such as Mailchimp, Typeform, Social Media (YouTube, Facebook, Twitter and Instagram), *PayPal* and Eventbrite, among others. The data processing performed by the mentioned platforms and applications are governed by their respective privacy policies.

All information collected is stored and will only be provided to third parties in accordance with the EUI Data Protection Policy (eg. in case of an administrative inquiry or disciplinary action by the EUI or upon a motivated request by a judicial or a law-enforcement authority).

6) Use of Cookies

When accessing the websites of the EUI, its departments, programmes, projects and service units, user authorisation will be required for the installation of cookies on the device used for access, which have the purpose of collecting information related to navigation activity and which may serve to improve the operation of the website, unless the cookies is used for the sole purpose of carrying out the transmission of a communication over an electronic communications network or is strictly necessary in order for the provision of a service explicitly requested by the user, situations in which consent will not be required.

Cookies may also be used to collect and store information about the queries made by each user, to enable searches based on these queries.

Cookies may also be used when accessing the webpages of the EUI, its departments, programmes, projects and service units maintained on social media such as YouTube, Facebook, Twitter, and Instagram. In such cases, the use of cookies will occur in accordance with the Privacy Policies of the respective social networks, which should be consulted by the user in advance.

7) Consent

Whenever the processing of personal data requires the user's consent, a request will be made to him/her to express his/her agreement.

This consent may be revoked at any time, provided that the user does so expressly and unequivocally. The withdrawal of consent will result in the termination of the processing activity, but will not necessarily result in the elimination of the personal data of the users, which may continue to be stored in specific cases provided for the EUI Data Protection Policy. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

8) Third Party Data Processing

In the event of inclusion of third party data in the websites of the EUI, its departments, programmes, projects and service units, the user is advised that he/she must obtain a free, express and informed consent of the respective data subject or his/her legal representative, as established by Law.

For the inclusion of data relating to minors, the user is advised that he/she must be the legal representative of said minor or minors or have obtained their consent in accordance with the Law.

The data subject or his/her legal representative, in the event of data pertaining to a minor, who becomes aware that his/her data is being processed by the EUI, its departments, programmes, projects and service units via the different webpages without a proper legal basis, may contact the responsible data controller via the e-mail indicated in the website through which this Privacy Policy was accessed, requesting that such data is deleted. In this case the data subject or his/her legal representative may be requested to present proof of his/her identity, also identifying the data he/she considers is being processed unlawfully.

9) The Processing of Sensitive Data

As a rule, the EUI does not process sensitive personal data of the users of its websites or of those of its departments, programmes, projects and service units.

If there is a need to process this specific type of data, the user (data subject) will be provided with the appropriate information on this type of processing.

10) Data Storage

The EUI, as a rule, uses its own servers for the storage of personal data pertaining to all users of its websites, which are located in the EUI servers and subject to the EUI Data Protection Policy.

There are, however, circumstances where personal data are stored on servers maintained outside the EUI, most of the time within the European Union area – but occasionally also outside the European Union –, as is the case with cloud storage, due to the computing services (*cloud*) that the EUI, its departments, programmes, projects and service units use. In such cases, the EUI will ensure that the personal data will receive the same level of protection that would be applied if stored on servers located within the EUI.

11) Use of Third-Party Applications

As already highlighted in previous items of this Privacy Policy, the EUI is not responsible for the processing of personal data carried out due to the use of systems or applications made available by third parties, even if access may have occurred through the use of links made available on its websites or on those of its departments, programmes, projects and service units.

Data processing carried out by third parties is governed by the Privacy Policies of their respective systems or applications.

Thus, it will be up to users to check the conditions for data processing indicated by those third parties before using their systems or applications. The user should carefully read the respective Privacy Policy of these systems and applications, being aware that the EUI has no responsibility or interference with the processing of personal data eventually conducted by them.

12) Google Analytics

To obtain statistical information about visits to its website and, therefore, allow for the improvement of its functionality, the EUI uses the service called Google Analytics.

The processing of any personal data collected by this tool is subject to European Union legislation and the Google Privacy Policy. It is highly recommended that users consult said policy in advance.

13) How Personal Data is Used

All personal data collected through its websites or those of its departments, programmes, projects and service units are used for specified reasons related to the institutional mission of the EUI as highlighted in item 1 of this Privacy Policy. These purposes when achieved will lead to the termination of the processing activity and the elimination of all personal data collected. However, personal data will not be deleted once the processing is completed when there is another legal basis that requires its storage for a longer period (e.g. auditing obligations) or when it is possible to anonymize such data for use in studies and research.

14) Security

The EUI implements security levels within the legal requirements for the protection of personal data. However, it is important that the user is aware that due to the very nature and technical characteristics of the Internet, this protection is not infallible and is subject to violation by various malicious practices.

However, in the event of any security incident involving the personal data of the users of its websites or of those of its departments, programmes, projects and service units that entails relevant risk or damage, the EUI complies with the rules set forth in its Data Protection Policy, and undertakes to inform users of such an occurrence, unless:

- a) appropriate technical and organizational measures to the personal data affected by the security breach were implemented;
- b) effective remedial actions have been taken;
- c) it would involve disproportionate effort. In such a case, the communication is made through an equally effective manner, such as a public communication.

15) Rights and Responsibilities

Notwithstanding the protection of trade secrets, the EUI is committed to maintaining transparency, assuring users of its websites – including the ones of its departments, programmes, projects and service units services - that they will have access to information regarding the data processing it carries out, providing them with the correction and update of personal data that may be incorrect, inaccurate or outdated.

The EUI also ensures, in addition to all other rights provided for by its Data Protection Policy, the anonymization, blocking or deletion of personal data which prove to be unnecessary or which are not being processed in accordance with this Privacy Policy or the EUI Data Protection Policy.

The user shall also act in a collaborative and transparent manner, undertaking to provide, whenever requested, accurate and correct information, assuming the obligation to keep ALL his/her data updated.

Your rights may be exercised and enforced by contacting the responsible data controller via the e-mail indicated in the website through which this Privacy Policy was accessed.

16) Data Protection Officer

All pending questions, suggestions and concerns regarding this Privacy Policy should be addressed to the EUI Data Protection Officer (EUI's DPO).

The EUI's DPO can be contacted by e-mail at: Data_Protection_Officer@EUI.eu or by post at the following address:

EUI Data Protection Officer
European University Institute
Convento di San Domenico
Via delle Fontanelle, 19
I-50014 San Domenico di Fiesole (FI), Italy