

## PRIVACY NOTICE

### CONTACT FORM - STUDENT ROOM BOOKING/FACILITY VISIT

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The Company, **Campus X S.r.l.** with registered office in Rome, Via Abruzzi n. 25, in its capacity as Data Controller (hereinafter also referred to as "Data Controller"), protects the personal data of the Data Subjects by ensuring confidentiality and compliance with the regulations in force and guaranteeing the necessary level of protection against any event that might put them at risk of being breached.

In accordance with Article 13 of the GDPR, Campus X, in its capacity as Data Controller, is required to provide you with the following information regarding the purposes and methods with which your personal data is processed.

We would also like to inform you that Campus X has appointed a Data Protection Officer (hereinafter also referred to as "DPO") whom you may contact if you have any questions about our policies and practices relating to the processing of personal data.

You can contact the DPO/DPO at the addresses and contact details below:

[dpocx@cx-place.com](mailto:dpocx@cx-place.com)

#### **1. TYPE OF PERSONAL DATA PROCESSED**

In particular, the following personal data concerning you may be processed:  
common personal identification data:

- Name;
- Surname;
- e-mail address;
- telephone;
- nationality;
- city;
- other information (contained in the message you sent);
- other data relating to its actions (see point (2b)).

#### **2. PURPOSE AND LEGAL BASIS OF PROCESSING**

Your personal data will be processed for the following purposes:

a) Managing your request for information about:

- the reservation of a room at our student residential facilities or to the reservation of a visit to the facilities
- the possibility of investing in student housing.

b) sending promotional and marketing communications, including newsletters and market research, by automated means (sms, email, push notifications) and not (paper mail, telephone with operator); it should be noted that the Data Controller collects only one consent for the marketing purposes described herein, pursuant to the General Provision of the Garante per la Protezione dei Dati Personali "Linee guida in materia di attività promozionale e contrasto allo spam" of 4 July 2013; If, in any case, you wish to object to the processing of your data for marketing purposes carried out by the means indicated herein, as well as to withdraw the consent given, you may do so at any time by contacting the Controller at the contact details indicated in this information notice, without affecting the lawfulness of the processing based on the consent given before the revocation.

Your personal data will then be processed for the purpose of sending you information about offers, special promotions, events, as well as commercial or promotional communications.

Campus X, in order to improve the results of communications, has implemented and uses systems for sending promotional/commercial communications in the form of newsletters, equipped with reporting mechanisms. As a result of the use of such tools, the Data Controller may know, for example:

- the number of readers, openings of messages and clicks made by users on those messages;
- the type of device used to read the communication (desktop, mobile);
- the number of users who have not yet confirmed their registration ('suspended' users);
- the number of emails sent per date/time/minute;
- the detail of delivered versus sent emails;
- those who have requested to unsubscribe from the newsletter;

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- email openings and clicks on individual links;
- link tracking (the number of clicks made on the links in the message);
- click tracking (which links have been clicked).

All this data is used for the purpose of comparing, and possibly improving, the results of communications.

The legal basis underlying the processing and the purpose referred to in point (a) of this paragraph is:

Article 6(1)(b) GDPR "processing is necessary for the performance of a contract to which the data subject is party or for pre-contractual measures taken at the request of the data subject";

the legal basis underlying the processing and the purpose referred to in subparagraph (b) of this point is:

art. 6 par.1 lett. a) GDPR "the Data Subject has given consent to the processing of his/her personal data for one or more specific purposes".

#### **3. METHOD OF TREATMENT**

The processing of your personal data shall be carried out mainly through computerised tools and by means of paper media by people within the Owner's organisation who are duly authorised and trained for this purpose in accordance with the methods and with the means suitable to guarantee the security and confidentiality of the personal data themselves, in compliance with the provisions of the GDPR.

The Data Controller carries out periodic checks to ensure that no personal data are collected, filed or stored that are not necessary in relation to the processing operations and related purposes as listed in point n. of 2this notice.

In carrying out these activities, Campus X undertakes to:

- a) ensure the accuracy and updating of the personal data processed, and promptly receive any corrections and/or additions requested by you;
- b) notify you, within the time limits and in the cases provided for by the legislation in force, of any breaches of personal data;
- (c) ensure that processing operations comply with the applicable legal provisions.

#### **4. RECIPIENTS OF PERSONAL DATA**

Personal data processed for the purposes referred to in point n. of 2this information notice may be communicated:

- to duly authorised internal members of the Controller's staff for the parts of the processing for which they are responsible;
- to external parties such as:
  - information society and computer assistance;
  - providers of IT infrastructure and solutions;
  - companies providing marketing services;
  - web service providers.

The communication concerns the categories of personal data whose transmission to the above-mentioned third parties is necessary for the performance of the activities and for the purposes referred to in this statement and, in any case, in connection with the pre-contractual relationship with you.

Your consent is not required for the processing in question, as it is carried out for the purpose of executing pre-contractual measures dependent on your request.

Under no circumstances may your personal data be disseminated.

#### **5. EXTRA EU/SS TRANSFER**

The Data Controller does not transfer your personal data abroad (by "abroad" is meant all countries not belonging to the European Economic Area).

#### **6. PERIOD OF RETENTION/DATA RETENTION**

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In relation to the purposes set out in point nr. 2 letter a), the personal data concerning you will be processed and stored by the Data Controller for the time necessary to fulfil your request for information and to send you communications concerning the booking of a room or a visit to the facilities of the Data Controller carried out following your request and, in any case, for no longer than two (2) years.

Longer storage periods may apply in the event of specific legal obligations or in the event that the Data Controller receives requests from public authorities or for additional requirements to protect your rights or the rights of the Data Controller.

The personal data processed by the Data Controller for marketing purposes (point nr. 2 letter b), for sending commercial communications through newsletters or other means) will be kept for twenty-four (24) months, unless you proceed to revoke the consent you have given and/or in the event of your objection to the processing.

Once the above-mentioned deadlines have been reached, the Data Controller will delete the data concerning you.

#### **7. RIGHTS OF THE DATA SUBJECT**

Pursuant to EU Reg. n°2016/679 you have the right to:

- obtain confirmation of the processing carried out by the Data Controller on your personal data;
- to access your personal data and to know their origin (when your personal data are not obtained directly from you but are collected from third parties), the purposes of the processing, the data of the persons to whom they are communicated (recipients), the period of storage of the personal data or, failing that, the criteria for determining this period;
- obtain the rectification of your personal data;
- obtain the deletion of your personal data from the Data Controller's databases if they are no longer necessary for the purposes for which they were collected or if the processing is unlawful and in the other cases referred to in Article 17 GDPR;
- limit the processing of personal data relating to you, for example, where its accuracy is contested, for the period necessary for the Controller to verify its accuracy and in all other cases referred to in Article 18 GDPR;
- to obtain your personal data in electronic format, also in order to be able to communicate them to another data controller (portability).

You may exercise your rights by writing to the Data Controller at the following address:

[dpocx@cx-place.com](mailto:dpocx@cx-place.com)

The Controller shall do so without delay and, in any event, no later than one month after receipt of the request. The deadline may be extended by two months, in which case the Controller shall inform you within 30 days of the reasons for the extension.

#### **8. COMPLAINT**

You have the right to lodge a complaint with the Data Protection Authority.

If you reside in a different member state or if a breach of data protection law occurs in an EU country other than the country where Campus X is based, you must lodge a complaint with the data protection supervisory authority of that country.

The lodging of a complaint is without prejudice to the possibility of bringing any other legal action.

#### **9. PROVISION OF DATA AND CONSEQUENCES**

The provision of your personal data is not compulsory but it is nevertheless necessary for the purposes set out in point 2 of this information notice in order to fulfil the request you have made through the form "Book your student room" and/or "Book your visit" and which, if not provided, will make it impossible for the Controller to fulfil your requests.

Refusal to provide the personal data requested may make it impossible for the Controller to fulfil your Request.

#### **10. EXISTENCE OF AUTOMATED DECISION-MAKING**

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Pursuant to Art. 13 par. 2 lett. f) of the GDPR Campus X informs you that your personal data are not and will not be subject to any processing operation involving automated decision-making or any profiling activity.