

**PRIVACY POLICY**  
**TENDER FOR THE ALLOCATION OF BEDS**

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In their capacity as Independent Data Controllers (hereafter, 'Data Controller(s)'), the Company **CAMPUS X s.r.l.**, with registered office located in Rome, via Abruzzi 25, and the **Fondazione eXperience**, with registered office in Chieti, via Papa Giovanni Paolo II 179, shall safeguard the personal data of data subjects concerned, by ensuring confidentiality and compliance with the regulation in force, as well as guaranteeing the necessary level of protection from any event that may result in a violation of such data.

Pursuant to Article 13 of the GDPR, Campus X and Fondazione eXperience, in their capacity as Data Controllers, shall provide you with the following information regarding the purposes and the manner in which your personal data are processed.

Moreover, we would like to inform you that Campus X and Fondazione eXperience appointed a Data Protection Officer (hereafter, 'DPO') you may get in touch with in case you have any question on the policy and practice adopted for personal data processing.

You can contact the DPO to the following email address: [dpocx@cx-place.com](mailto:dpocx@cx-place.com)

**1. TYPES OF PERSONAL DATA WHICH ARE SUBJECT TO PROCESSING**

The following personal data regarding you may be subject to processing:

- Name
- Surname
- Email address
- Telephone number
- Gender
- Nationality
- University you are enrolled in
- High School Diploma grade in case you are enrolled in the first year of a degree course
- Graduation grade and/or arithmetic mean of exams taken (if enrolled in years subsequent to the first year of a degree course)
- Equivalent Economic Status Indicator (*ISEE*)
- Notes or any other information voluntarily provided by you

**2. PURPOSES AND LEGAL BASIS FOR THE PROCESSING**

The personal data regarding you shall be processed for the following purposes: management of your request to participate in the tender for the allocation of a bed in Campus X's building located in Milan, viale Suzzani 96/98. For any information regarding the tender and how to participate in it, please refer to the tender itself.

The legal basis for the processing and the purposes referred to in the previous paragraph of this point is:

## PRIVACY POLICY

### TENDER FOR THE ALLOCATION OF BEDS

---

Article 6, paragraph 1 (b) of the GDPR "processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract."

### **3. MANNER OF PROCESSING**

Your personal data will mainly be processed by means of IT tools and printed documents by people within the companies of the Data Controller, who were duly authorised and trained for such purpose, according to the manners and through specific means aimed at ensuring the security and confidentiality of personal data themselves, in compliance with what is provided for by the GDPR.

The Data Controllers shall regularly run checks in order to ensure that the personal data which are not necessary for the processing and relevant purposes referred to in point 2 of this privacy policy are not collected, recorded or stored.

In carrying out the abovementioned activities, the Data Controllers undertake to:

- a) make sure that the personal data processed are correct and updated, and promptly make any change and/or integration that may be requested by you from time to time;
- b) inform you about any violation of your personal data, within the time limits and in the cases provided for by the regulation in force;
- c) ensure that the processing of personal data is carried out in compliance with applicable legal provisions.

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

The personal data processed for the purposes referred to in point 2 of this privacy policy may be disclosed to:

- people within the companies of each Data Controller duly authorised to process relevant data;
- people outside the companies, such as:
  - suppliers of infrastructures and IT solutions;
  - suppliers of web services;

The disclosure regards the categories of personal data whose transmission to the abovementioned third parties is deemed necessary to carry out the activities and for the purposes referred to in his privacy policy and, in any case, for the relationship established with you.

For the processing in question your consent is not necessary since consent results from the performance of the activities needed for and resulting from your request to participate in the abovementioned tender.

The personal data regarding you may not be disseminated in any case whatsoever.

### **5. TRANSFER OUTSIDE OF THE EU/EEA**

The Data Controllers will not transfer any of your personal data abroad (where 'abroad' refers to any country which does not belong to the European Economic Area).

## **PRIVACY POLICY**

### **TENDER FOR THE ALLOCATION OF BEDS**

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

With regards to the purposes referred to in point 2, the personal data regarding you shall be processed and stored by the Data Controllers for the period of time needed in order to comply with your request to participate in the tender for the allocation of beds and the possible subsequent management of the obligations regarding the allocation of beds and, in any case, for no more than three years.

Longer storage periods may be applied in case there are specific legal requirements or in case the Data Controller receives requests from public authorities or for the safeguard of your rights and the Data Controller rights.

When the abovementioned period of time expires, the Independent Data Controllers will erase your personal data.

#### **7. DATA SUBJECT RIGHTS**

According to Regulation (EU) 2016/679 (GDPR), you shall have the right to:

- obtain confirmation of personal data concerning you which are being processed by the Data Controller;
- access your personal data and be informed about the purposes of their processing, as well as the data of the subjects they are disclosed to (i.e., recipients), their storage period or, if there is none, the criteria to be used in order to establish it;
- obtain the rectification of your personal data;
- obtain the erasure of your personal data from the Data Controller's databases in case they are no longer required for the purposes they were collected for, or if their processing is found to be unlawful, as well as in the other cases provided for by Article 17 of the GDPR;
- limit the processing of your personal data, e.g. if they are found to be incorrect, for the period of time needed by the Data Controller to make sure they are correct, as well as in the other cases provided for by Article 17 of the GDPR;
- obtain your personal data, in electronic form, also in order to disclose them to other Data Controllers (i.e., portability).

You may exercise your rights by addressing in writing each Independent Data Controller to the following email address: [dpocx@cx-place.com](mailto:dpocx@cx-place.com)

Each Data Controller shall do so without any delay and, in any case, at the latest within one month of the receipt of the request. The deadline may be extended by two months, in which case the Data Controller shall always inform you within thirty days of the reasons why the extension is necessary.

#### **8. COMPLAINT**

You shall have the right to file a complaint to the Data Protection Supervisory Authority.

In case you reside in another member state or the violation of the regulation aimed at safeguarding personal data is committed in another EU country than the one where Campus X's or Fondazione eXperience's registered offices are located, you shall file a complaint to the

## **PRIVACY POLICY**

### **TENDER FOR THE ALLOCATION OF BEDS**

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Authority in charge of monitoring compliance with the legislation on the protection of personal data in that country.

The possibility of filing a complaint is without prejudice to the possibility to take any other legal action.

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

The provision of your personal data is not mandatory but it is, in any case, necessary for the purposes referred to in point 2 of this privacy policy in order to comply with your request. Moreover, in the event that such data are not provided, it would be impossible for the Data Controllers to comply with your request to participate in the project.

Refusal to provide the requested personal data may make it impossible for the Data Controllers to comply with your request.

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

Pursuant to Article 13, paragraph 2 (f) of the GDPR, Campus X and Fondazione eXperience inform you that your personal data shall not and will not be processed in a way as to result in automated decision-making processes, including profiling.

#### **Sede Legale**

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#### **CAMPUSX srl**

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PIVA: 07605420962  
Società soggetta all'attività  
di direzione e coordinamento da parte  
di The Student World Srl