

## PRIVACY POLICY

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**Campus X S.r.l.** with registered office in Rome, Via Abruzzi n. 25, as Data Controller, protects your personal data, provided by you while browsing and using the website <https://www.cx-place.com/it/>, ensuring their confidentiality and guaranteeing compliance with the regulations in force as well as the necessary level of protection, from any event that may put them at risk of violation.

As required by art. 13 of the General Data Protection Regulation of the European Union (GDPR), Campus X informs you that your personal data, collected through the website, are processed by computer and/or telematic means, for the purposes indicated below in this statement.

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

The computer systems and software procedures used to operate this site acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

Consequently, the following personal data, by way of example, may be processed

- browsing data: this category of data includes IP addresses or domain names of the computers and terminals used by users, URI/URL (Uniform Resource Identifier/Locator) notation addresses, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and IT environment. These data, which are necessary for the use of web services, are also processed in order to: obtain statistical information on the use of services (most visited pages, number of visitors per time slot or per day, geographical areas of origin, etc.); check the correct functioning of the services offered.

- data communicated by the user: such as, for example, the personal data provided by you through the "contact us" form, the data provided in the "book a visit" section, the personal data provided in the "book your hotel room" section, the data contained in the Cv sent by you through the "work with us" section of this site.

The optional sending of such requests by filling in and submitting the forms on the Campus X website entails the acquisition of your personal data, for details of which please refer to the dedicated information available at the following links:

#### **- CUSTOMER INFORMATION:**

[https://www.cx-place.com/public/DOCUMENTI\\_PRIVACY/CX\\_INFORMATIVA\\_CLIENTI\\_ENG.pdf](https://www.cx-place.com/public/DOCUMENTI_PRIVACY/CX_INFORMATIVA_CLIENTI_ENG.pdf)

#### **- CONTACT INFORMATION:**

[https://www.cx-place.com/public/DOCUMENTI\\_PRIVACY/CX\\_INFORMATIVA\\_CONTATTI\\_ENG.pdf](https://www.cx-place.com/public/DOCUMENTI_PRIVACY/CX_INFORMATIVA_CONTATTI_ENG.pdf)

#### **- INFORMATION FOR APPLICANTS:**

[https://www.cx-place.com/public/DOCUMENTI\\_PRIVACY/CX\\_INFORMATIVA\\_RICHIEDENTI\\_IMPIEGO\\_ENG.pdf](https://www.cx-place.com/public/DOCUMENTI_PRIVACY/CX_INFORMATIVA_RICHIEDENTI_IMPIEGO_ENG.pdf)

- cookies and other tracking systems: for details of the cookies used by this site, please refer to the extended cookie policy available at the following link:

[https://www.cx-place.com/public/DOCUMENTI\\_PRIVACY/COOKIE\\_POLICY\\_ENG.pdf](https://www.cx-place.com/public/DOCUMENTI_PRIVACY/COOKIE_POLICY_ENG.pdf).

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

Your personal data will be processed for the following purposes:

(a) to allow the fruition and use of this website, as well as to carry out the maintenance and technical assistance necessary for its proper functioning;

b) to allow the Data Controller to respond to requests made by you through this website.

The legal basis underlying the processing referred to in letter a) of this point is:

Art. n°6 par.1 lett. f) GDPR: "processing is necessary for the purposes of pursuing the legitimate interests of the controller or a third party";

For the legal bases underlying the processing operations referred to in letter b) of this point, please refer to the information on each processing operation available at the above-mentioned links.

### **3. PROCESSING METHODS**

The personal data being processed are collected directly by the Data Controller or by third parties expressly authorised by the latter, or communicated by the Data Controller to such third parties for the pursuit of the purposes set forth in point 2.

The processing of personal data shall be carried out mainly with the aid of computerised tools by persons inside and outside the Data Controller's organisation who are duly authorised and instructed for this purpose in accordance with the methods and with the means suitable to guarantee the security and confidentiality of the data, in compliance with the provisions of the GDPR.

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

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

The personal data processed for the purposes referred to in point 2 of this information notice may be communicated to

- to internal subjects within the Data Controller's organisation who are duly authorised for the parts of processing for which they are responsible;
- to external parties acting as Data Processors on behalf of Campus X such as:
  - information and computer assistance companies;
  - companies or professional firms offering professional and/or consultancy services to Campus X in relation to accounting, legal, tax, administrative, financial and credit recovery matters
  - providers of IT infrastructure and solutions
  - web service providers;
  - banks and payment service providers, acting as data processors, to whom your personal data may be disclosed for the purpose of processing your payments;
  - consultants, to the extent necessary for the performance of their professional duties.

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.

The updated list of Data Processors and of persons authorised to process data is kept at the Data Controller's head office and is available upon request by e-mail at [dpocx@cx-place.com](mailto:dpocx@cx-place.com).

Your consent is not required for the processing of your personal data, as described in this paragraph, as it is carried out in order to fulfil the obligations arising from your request.

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Your personal data may be communicated to public bodies, organs and authorities that act as autonomous Data Controllers, in accordance with applicable laws or to comply with binding provisions.

In no case will your personal data be communicated to other categories of third parties (in addition to those mentioned above) and will not be subject to dissemination operations.

### **5. EXTRA EU TRANSFER**

The Data Controller does not transfer your personal data abroad (i.e. all countries not belonging to the European Economic Area).

The management and storage of your personal data will take place on the servers of the Data Controller and/or of third party companies duly appointed as Data Processors, located within the European Union.

Without prejudice to the transfers referred to in the preceding paragraphs, some of your Personal Data resulting from the use of cookies and other tracking tools are shared with recipients that may be located outside the European Economic Area. Campus X ensures that your Personal Data is processed by such recipients in accordance with applicable data protection legislation. Such transfers may be based on the adequacy decision or on standard contractual clauses approved by the European Commission. You can request further information on this at: [dpocx@cx-place.com](mailto:dpocx@cx-place.com)

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

Your personal data will be processed by the Data Controller for the time necessary to achieve the purposes for which they were collected as set out in point 2 of this notice.

For details on the terms of retention of your personal data, please refer to the information on each processing operation available at the links above.

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

Longer retention periods may be applied in the presence of specific legal obligations or in the event that the Data Controller receives requests from public authorities or for further needs to protect the rights of the Data Controller or the Data Subject.

### **7. YOUR RIGHTS**

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

- obtain confirmation of the processing carried out by the Data Controller on the personal data concerning you;
- access the personal data concerning you and know their origin (when the data are not obtained directly from you), the purposes of processing, the data of the persons to whom they are communicated (recipients), the storage period of the data or, failing that, the criteria for determining it;
- obtain the rectification of your personal data;
- obtain the deletion of personal data concerning you 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;

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- limit the processing of personal data concerning you, for example, where its accuracy is contested, for the period necessary for the Data Controller to verify its accuracy and in all other cases referred to in Article 18 GDPR;

- obtain your personal data in electronic format, also in order to be able to communicate them to another Data Controller (portability).

You may assert your rights by contacting the Data Controller in writing at [dpocx@cx-place.com](mailto:dpocx@cx-place.com). The Data Controller shall do so without delay and, in any event, no later than one month after receipt of the request. The term may be extended by two months, in which case the Data Controller shall inform you, within thirty days, of the reasons making the extension necessary.

### **8. COMPLAINTS**

You have the right to lodge a complaint with the Guarantor Authority for the Protection of Personal Data.

If you are resident in a different member state or if the breach of data protection legislation occurs in another EU country than the country where the Data Controller is based, you must lodge a complaint with the authority responsible for monitoring compliance with data protection legislation in that country.

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

### **9. CHANGES TO THIS INFORMATION NOTICE**

The Data Controller reserves the right to make changes to this Privacy Policy at any time by publicising them to users on the website <https://www.cx-place.com/it/>. Therefore, please consult this page often, taking as reference the date of the last modification indicated at the end of the document. If you do not accept the changes made to this Privacy Policy, you may request the Data Controller to delete the personal data concerning you. Unless otherwise specified, the previous Privacy Policy will continue to apply to the personal data collected up to that moment.