

“students” privacy policy



1. Data controller

The **Fondazione Centro di Musicologia Walter Stauffer**, whose office is registered in Cremona - Corso Garibaldi n. 178, VAT and tax code 00319130191, hereinafter referred to as the "**Controller**", guarantees compliance with regulations for the protection of personal data by providing the following information on data processing, pursuant to art. 13, EU Regulation 2016/679 (General Data Protection Regulation - GDPR) and subsequent amendments.



2. Data processed, purposes and legal bases for processing

The personal data provided by the data subject includes:

- identification and contact data (first name, last name, date of birth, place of residence, phone number, email address, educational qualifications);
- curriculum vitae;
- video audition.

The above-mentioned data are collected and processed for the following purposes:

- a) to ensure the correct and complete execution of all obligations related to the application and possible subsequent enrollment in the courses promoted by the Data Controller;
- b) to fulfill legal obligations or respond to requests from judicial authorities;
- c) to maintain the historical "alumni" archive (Article 2-sexies of Legislative Decree 196/2003, paragraph q; private archive of relevant cultural interest pursuant to Article 13 of the Cultural Heritage Code, Legislative Decree no. 42/2004).

The legal basis for the processing is:

- with regard to the purposes referred to in point 2, letters a) and b), the performance of a contract to which the data subject is party or the execution of pre-contractual measures taken at the request of the same;
- with regard to the purposes referred to in point 2, letter c), the necessity of processing for reasons of significant public interest.



3. Nature of the provision

The provision of data:

- with regard to the purposes referred to in point 2, letters a) and b), is mandatory, and any refusal will make it impossible for the Data Controller to fulfill the contractual obligations undertaken;
- with regard to the purposes referred to in point 2, letter c), is to be considered optional for those purposes; therefore, any refusal will not prevent the fulfillment of the contractual obligations undertaken.



4. Places and methods of processing and data retention periods

The data collected through the website are processed at the premises of the Data Controller.

The data collected will be processed using electronic or otherwise automated, IT, and telematic tools, or through manual processing, with logic strictly related to the purposes for which the personal data were collected and, in any case, in a way that ensures their security at all times.

The data are stored for the time strictly necessary to manage the purposes for which they are processed ("storage limitation principle", Art. 5, EU Regulation 2016/679), or in compliance with the deadlines established by applicable laws and legal obligations. Data are stored for 10 years in the case of actual enrollment in courses, and for 1 year in the case of applications that do not result in enrollment.

The relevance and up-to-dateness of the stored data, in relation to the purposes for which they were collected, are periodically reviewed.

In any case, the Data Controller applies rules that prevent indefinite data retention and therefore limits the storage period in accordance with the principle of data minimization.



5. Entities authorized to process data, supervision and communication of data

The processing of the collected data is carried out by personnel of the Data Controller, specifically identified and authorized to process the data, according to specific instructions and in compliance with current regulations.

The data collected, within the limits relevant to the purposes of the processing and where necessary or instrumental for the execution of such purposes, may be processed by third parties appointed as external Data Processors, or, depending on the case, disclosed to them as independent Data Controllers. These may

include companies, entities, or associations that provide services connected to or instrumental for the fulfillment of the purposes mentioned above (e.g., tax compliance, IT system maintenance, etc.).

Furthermore, the collected data may be processed by third parties, acting as independent Data Controllers, who collaborate with the Data Controller in academic or educational activities for the execution of the purposes set out in point 2 (e.g., agreements related to educational projects, concerts, etc.).

The collected data may also be disclosed, in the cases provided by law, in response to legitimate requests from judicial authorities.

Under no circumstances and for no reason will your data be disseminated in any way.



6. Data transfer to non-EU countries

Collected data will not be transferred outside the European Union.



7. Rights of the data subject

In relation to the personal data communicated, the data subject has the right to exercise the following:

- a. (Article 7.3 EU Regulation 679/2016 - GDPR) withdrawal of consent;
- b. (Article 15 EU Regulation 679/2016 - GDPR) right of access by the data subject;
- c. (Article 16 EU Regulation 679/2016 - GDPR) request rectification;
- d. (Article 17 EU Regulation 679/2016 - GDPR) request erasure ("right to be forgotten");
- e. (Article 18 EU Regulation 679/2016 - GDPR) right to restriction of processing;
- f. (Article 20 EU Regulation 679/2016 - GDPR) receive data in a structured format, commonly used and machine-readable, for the purpose of exercising the right to portability;
- g. (Article 21 EU Regulation 679/2016 - GDPR) objection to processing.

The subject can exercise her or his rights, as well as request more information relating to her or his personal data, by sending an e-mail to privacy@stauffer.org specifying the content of the request in the subject field.

Requests relating to the subject's rights will be processed without undue delay and, in any case, within one month of the request; only in cases of particular complexity or multiple requests can this deadline be extended by a further 2 (two) months.

We remind you that it is your right (pursuant to art. 77 of EU Regulation 679/2016 – GDPR) to lodge a complaint with the Guarantor for the Protection of Personal Data, whose contact details are available [here](#).

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