

PERSONAL DATA PROTECTION POLICY

(under art. 13 AND 14 of the General Data Protection Regulation 2016/679 – “GDPR”)

Your data is collected by:

Fondazione European School of Management Italia (FONDAZIONE ESMI), non-profit Institution of Higher Education located at 218 bis, Corso Unione Sovietica 10134 Torino, Italia

-the Controller: Fondazione European School of Management Italia – gdprtorino@escp.eu

-the Data Protection Officer (DPO): Coni Alberto Gianni – dpotorino@escp.eu

The personal data collected by Fondazione ESMI:

Fondazione ESMI collects information such as:

In a general way:

- Title
- Name
- First name(s)
- E-mail address
- Documentation requests
- Services requests

For applicants, students, clients, and third-party payers:

- Postal address
- Phone number(s)
- Resume (students and clients only)
- Prior grades and degrees
- Socio-professional category
- Data relating to means of payment: postal or bank identity statement, check and/or credit card number, credit card expiry date
- Transaction data: transaction number, service subscription detail
- History of the contractual relationship
- Student's photos

For graduates:

- Degrees awarded
- Grades obtained

For companies, partners, and subcontractors:

- Name
- Legal status
- Share capital
- Head Office Address



Staff

Data relating to means of payment: postal or bank identity statement, check and/or credit card number, credit card expiry date

Transaction data: transaction number, service subscription detail

History of the contractual relationship

For corporate representatives, partners and subcontractors:

Title

Name

First name(s)

E-mail address

Company

Function/Job

Phone number

For participants in institutional events and initiatives promoted by the school:

in addition to the identification data specified above:

images (photographs and videos) produced during the event

Any audio and video recording for lectures or other activities delivered online/onsite (es. Webinar, etc.)

Purposes of processing personal data:

Business development management:

Fulfilment of marketing operations based on the consent of the data subject (including the dissemination of images (videos and photos) collected during institutional events and initiatives promoted by the school through its institutional online channels)

Fulfilment of processing operations related to client relationship management and in particular those relating to technical prospecting operations (including technical operations such as normalization, standardization, improvement and deduplication)

Selections of people to carry out operations such as prospection, loyalty, researches

Production statistics (trade...)

Handover, rental or exchange of its client or prospect files to the various ESCP campuses or to all commercial and academic partners

Management of requests for access, rectification and opposition rights

Contractual relationship management:

Creation of an account on ESCP's digital tools

Acquisition of services

Application and Admission management

Student enrollment

Student education management online and onsite

Audio and video recording for educational purposes and for exams monitoring (e.g. online lectures and exams, etc.)



Communications management and exchanges follow-up
Preparation and dissemination of student directories
Billing
Contractual relationship follow-up
Outstandings and disputes management
Management of consents and authorization concerning the use of data
Sending of newsletters and commercial solicitations especially through electronic means
Transmission to partners and subcontractors taking part in the education
Compliance with applicable legal and required obligations, and especially with transmission data requests by public authorities and administrations
Transmission to partners in charge of processing and awarding degrees
Transmission of data to companies and especially the CV
Management to avoid fraud risks

Data collection:

The data is collected by Fondazione ESMI during the following operations and processes

- When navigating via an ESCP Business School websites or a landing page (<http://master.escpeuropetorino.it>)
- When creating an account or a personal space on Aurion platform where the owner is ESCP Business School
- When an information request is made
- When documentation is requested or downloaded (flyer, information leaflet...)
- When ordering products or services
- When registering using any ESCP Business School form
- During a marketing campaign
- During institutional events and initiatives promoted by the school

Fondazione ESMI may collect data directly or indirectly.

Fondazione ESMI may also obtain data from a third party or from a partner. In this case Fondazione ESMI only receives data from entities complying with the GDPR and whose data subjects have consented to the transmission processing and use of data by Fondazione ESMI.

Data transmission and/or destination:

Data may be transmitted especially:

- To all ESCP campus entities subject to the GDPR provisions and which apply the same operating methods and data processing as ESCP
- To academic partners within or outside the European Economic Area who are involved in the education of people concerned by data processing
- To its educational or technical subcontractors who have access to the personal information required for the performance of their services and who are not authorized to use them for other

purposes. In addition, they are required to treat such personal information in accordance with applicable personal data protection policy (GDPR)

To any third party if such transmission is essential in the context of the contractual relationship

To administrations and/or public authorities in accordance with the legal and required obligations

Data retention periods:

Fondazione ESMI keeps personal data for the time necessary to achieve the purposes specified above as well as to comply with its legal and required obligations.

Retention period of personal data	
Customer and supplier personal data	10 years from contract signature
Identification data (including videos and photos) collected during institutional events and initiatives promoted by the school	5 years from the event
Registration files (personal information, copy of degree, titles and works_) of the student	8 years from registration (and in any case 5 years from graduation)
Grades, degrees and results obtained	50 years after the test or graduation
Documents produced by the student, internship reports and proof copies	5 year from tests
Student's thesis	5 years
Data concerning payments	10 years from the last payment made
Identity document transmitted as part of the right to access, modification and deletion	1 year from the receipt
Data concerning an applicant not becoming a student of ESCP	5 years from the first communication
Data pertaining to a prospect/lead (used for marketing activities)	2 years from data collection 1 year, if data is used for profiling activities

Data hosting:



The different categories of data collected and processed by Fondazione ESMI are hosted in the European Union. In case of data hosting outside the European Union, Fondazione ESMI shall issue a dedicated privacy statement and take all necessary measures to ensure the security of the data transmitted.

Data protection / Security

Fondazione ESMI protects personal data, using secured digital tools.

Fondazione ESMI implements electronic security measures and procedures to ensure security risks concerning the collection, storage, retention and transmission of personal data.

Access, modification and deletion rights:

Pursuant to articles no. 13 and 14 of the General Data Protection Regulation 2016/679 – ‘GDPR’, data subjects have a right to portability, a right to access, modify, oppose, delete their personal data.

The above-mentioned rights can be exercised by means of a written request to be sent to:

gdpertorino@escp.eu or dpotorino@escp.eu

The subject has the right to bring a complaint regarding personal data processing by FESMI to the Personal Data Protection Supervisor protocollo@pec.gdpd.it.

This request must be signed and accompanied by photocopy of an identity card bearing the signature of the holder and specify the address to which the response must be sent.

Important information:

It is specified that the data required for the education must be kept. If the student exercises his/her right to delete data concerning himself/herself before the end of his/her education, he/she will be alerted by the ESCP's services. If the student confirms his/her wish concerning this deletion, he/she will be deemed to have purely and simply renounced his/her education and will be considered to have resigned.

It is specified that the data needed to finance schooling must be kept in all cases. If the student or the third-party payer exercises his/her right to delete data concerning himself/herself before the end of his/her education or before the end of the financing of his/her education, the student or the third-party payer will be alerted by the ESCP's services. If the student confirms his/her wish concerning this deletion, he/she will be deemed to have purely and simply renounced his/her education and will be considered to have resigned. In any case, it will be impossible to delete data regarding past payments.