# NOTICE ON THE PROCESSING OF PERSONAL DATA FOR THE PURPOSES OF COVID-19 INFECTION PREVENTION

Pursuant to art. 13 of the European Regulation no. 679/2016 and any subsequent applicable legislation, we wish to inform you that Fondazione Bologna University Business School (hereinafter also referred to, for the sake of brevity, "BBS") performs the processing of your data for the purposes mentioned below, in compliance with the legislation on the protection of personal data.

This notice, made necessary for the processing required by the Covid-19 anti-infection measures, integrates any further information already delivered in relation to different processing operations.

#### 1. Processing of specific categories of data for the purposes of Covid-19 infection prevention.

In compliance with the regulations on the prevention of Covid-19 infection, we wish to inform you that, should you access BBS premises, it shall have to occur in compliance with the safety protocols BBS has adopted. BBS has entrusted its staff to measure your body temperature without recording the acquired piece of information, as set forth in the D.P.C.M. of April 26<sup>th</sup>, 2020, unless the threshold of 37.5°C of your body temperature is exceeded. In this case, BBS shall process your identification personal data associated to the exceeding of the body temperature as indicated above, with the purpose of documenting - if necessary- the reasons that prevented you from accessing the BBS premises (as well as, in the case of external collaborators, also the data of your Company/Authority and your phone details and email address, in order to be able to get in touch with you for the purpose of preventing the infection).

In addition to this, with the aim of preventing the Covid-19 infection, BBS shall be able to process further data relating to the state of health (for ex. onset of flu symptoms, medical certificate stating the swab test demonstrates the actual negativization) or the information relating to your not having had contacts with individuals who tested positive for COVID-19 and not coming from areas at epidemiological risk in the previous 14 days.

Should you refuse to provide the above-mentioned data, BBS shall not grant you access to or allow you to stay at its premises. If you take part, for any reason, in any of the courses, lessons or events organized at BBS, if and as they will be allowed by the provisions in force, we inform you that BBS shall keep the list of all participants for 14 days, in order to comply with the legal obligation as per the DPCM dated June 11th 2020, concerning the anti-infection purposes imposed by the regulation.

## 2. Legal basis of the processing

The legal basis of the processing resides in the implementation of the anti-infection safety protocols set forth

in art. no. 1, no. 7, letter d) of the D.P.C.M. dated March 11th 2020, as provided for by the mentioned D.P.C.M. dated April 26th 2020, and subsequent regulations, whose implementation is necessary for public interest reasons in the area of public health.

For such reason, your specific consent for the processing of said data will not be asked, according to article no. 9, Second paragraph, letter i) of the European Regulation no. 679/2016.

## 3. Duration and methods of the processing

The data possibly collected pursuant to art. no. 1 above shall be processed by BBS until the end of the state of emergency state connected to the Covid-19 epidemic.

The processing of personal data is carried out by BBS with paper or computerized methods.

## 4. Data controller

Data controller is the "Fondazione Bologna University Business School", having its headquarters at Villa Guastavillani, Via degli Scalini 18, Bologna (BO - Italy), enrollment number at the Register of Legal Entities at the Prefettura of Bologna 729, page 118 vol. 5, VAT no. 02095311201. The person in charge of responding to the person concerned in case of exercise of the rights set forth in articles. no. 15-21 of the Reg. (UE) 2016/679, is the Chief Operating Officer (also referred to as "C.O.O."), whose contact data can be found at the following link http://www.bbs.unibo.it in the section: CONTACTS.

## 5. Communication of your data to third parties

Your data shall not be disclosed nor communicated to third parties outside of the specific regulatory requirements. As a way of example, your data may be communicated in case of request by the Health Authorities to reconstruct the chain of possible close contacts of an individual who turned out to test positive for COVID-19.

## 6. Data Protection Officer

BBS has identified its Data Protection Officer, who may be contacted at the following address: dpo@bbs.unibo.it.

You may contact the Data Protection Officer for all matters relating to the processing of your personal data and the exercise of your rights arising from the European Regulation no. 679/2016.

#### 7. Processing location

BBS carries out the processing of your data in Italy.

Some of the designated Data Processors have their headquarters, or process your personal data, also in countries different from Italy, anyhow within the European Union.

## 8. Rights of the person concerned

Within the limits set by law, you may exercise the rights granted by articles no. 15-21 of the European Regulation no. 679/2016, among which the rights to ask the data controller for access to personal data, for amendment or cancellation of the said data, as well as the limitation of the processing of the data concerning you.

## 8.1 Methods for exercising the rights

The rights can be exercised by sending a communication to the headquarters of "Fondazione Bologna University Business School" indicated in point 4 above (Data controller) or to the email address gdpr@bbs.unibo.it.

As Person concerned by the processing of Data, you also have the right to lodge a complaint to the supervisory authority, the Italian Data Protection Authority (Garante), Piazza Venezia 11, 00187 Rome (Italy), <u>protocollo@pec.gpdp.it</u>, pursuant to articles 77 ff GDPR.