



UNIVERSITÀ DEGLI STUDI GUGLIELMO MARCONI

WHATSAPP PRIVACY NOTICE

Identity of the Data Controller

Pursuant to Article 13 of **Regulation (EU) 2016/679** of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter **General Data Protection Regulation**, abbreviated as “**G.D.P.R.**”), and the applicable national provisions from time to time in force, Università degli Studi Guglielmo Marconi informs you that:

- Università degli Studi Guglielmo Marconi (Tel. 06.377251 – Fax 06.37725212 – e-mail: info@unimarconi.it), with registered office in Rome, Via Plinio n. 44, represented by its legal representative pro tempore, is the **Data Controller** of the personal data concerning you (hereinafter “Data Controller”).
- The **Data Protection Officer (DPO)** is **Dr. Antonio Domenico Brasca** (email: dpo_gdpr@unimarconi.it).

Source of Data and Types of Data Collected

Online chat platforms and/or pre-assessment games involve the collection of personal data provided voluntarily by the user.

To access chat services with operators of Università degli Studi Guglielmo Marconi, it is sufficient to enter your name or nickname in the specific access forms, while to access the **WhatsApp Business chat** it is sufficient to write to the indicated number.

WhatsApp Business is also the operational tool through which the University’s offices may contact users in order to facilitate communications.

The data processed include: the user’s **phone number, first and last name, email address**, possibly a **nickname**, and the **content of the messages** exchanged in the chat.

Purpose of Processing

The information collected is necessary for the operation of the chat platform and to enable operators to provide personalized assistance, respond to user requests, and monitor and improve the quality of the service.

Università degli Studi Guglielmo Marconi does not use information obtained through the chat platform for marketing purposes without prior consent.





UNIVERSITÀ DEGLI STUDI GUGLIELMO MARCONI

In this specific case, the data may be processed for the purpose of sending **commercial communications and promotional initiatives of the University**.

It should also be noted that the data may be used to produce **anonymous statistical analyses in aggregated form** in order to improve service quality.

Legal Basis for Processing

The legal basis for processing is as follows: the data subject has given consent to the processing of their personal data for one or more specific purposes.

More specifically, pursuant to Articles 6 and 7 of the **GDPR 679/16**, choosing to activate the chat/games/WhatsApp contact constitutes a **free and unequivocal expression of consent through a positive action** to the processing of personal data such as browsing cookies, visited pages, etc.

The legal bases for processing are:

1. **Execution of pre-contractual and contractual measures** adopted at the request of the user/student to receive assistance or specific information from an operator.
2. **Explicit consent**, expressed through acceptance, for receiving marketing communications.

Methods of Data Processing

The data provided will be processed using **IT and telematic tools** necessary for delivering the services requested by the user/student.

Regarding the chat service, a **first-level consultation** is provided by operators of Università degli Studi Guglielmo Marconi.

With regard to processing carried out through the use of the **WhatsApp application**, the withdrawal of consent will result in the **cessation of marketing communications sent via chat**, without affecting the lawfulness of processing carried out prior to the withdrawal.

Data Recipients

The Personal Data of the Data Subject may be made accessible, for the purposes described above, to employees and collaborators of the Data Controller in their capacity as authorized personnel and/or internal data processors and/or system administrators.

They may also be accessible to third parties (such as website management and maintenance providers, suppliers, etc.) who perform **outsourced activities** on behalf of the Data Controller, acting as **external data processors**.





UNIVERSITÀ DEGLI STUDI GUGLIELMO MARCONI

Data Transfer

Personal Data may be transferred by the Data Controller to **third countries** where it has or will establish offices.

The transfer does not require specific authorization if the third country guarantees an **adequate level of protection**, based on an adequacy decision of the **European Commission** pursuant to Article 45 of the **G.D.P.R.**

In the absence of such a decision, the Data Controller may transfer Personal Data to a third country only if the guarantees and conditions provided by Article 49 of the **G.D.P.R.** are met.

The management and storage of Personal Data will take place on servers located within the **European Union**, belonging to the Data Controller and/or third-party companies duly appointed as Data Processors. Currently, the servers are located in **Italy and the Netherlands**.

The Data Controller may, if necessary, move the servers to **non-EU countries**, ensuring that such transfers comply with applicable legal provisions and, where necessary, adopting **standard contractual clauses approved by the European Commission**.

However, since the data are processed within the **WhatsApp service**, reference should also be made to the **terms and conditions of the WhatsApp service**, available online.

Data Retention

The Data Controller stores the content of chats and any subsequent feedback **only for the time strictly necessary** to provide services to the user:

- maximum **12 months for online chats**
- maximum **6 months for WhatsApp Business chats**

Data processed for **marketing purposes with consent** are retained until consent is withdrawn.

Rights of the Data Subject

With reference to Articles **15–22 of the GDPR**, the Data Subject has the right to:

- **Access** personal data (Art. 15)
- **Rectification** of data (Art. 16)
- **Erasure** of data (Art. 17)





UNIVERSITÀ DEGLI STUDI GUGLIELMO MARCONI

- **Restriction of processing** (Art. 18)
- **Data portability** (Art. 20)
- **Object to processing** (Art. 21)
- **Object to automated decision-making processes** (Art. 22)

The Data Subject may exercise these rights by writing to the Data Controller at the address indicated above or by email at dpo_gdpr@unimarconi.it, specifying the subject of the request, the right they intend to exercise, and attaching a copy of an identification document confirming the legitimacy of the request.

The Data Controller particularly reminds that each data subject may exercise the **right to object** in the forms and manner provided for by Article 21 of the GDPR.

Withdrawal of Consent

Pursuant to Article 7 of the GDPR, the user may **withdraw consent at any time** for marketing activities carried out through **WhatsApp Business** by writing directly in the chat, by sending an email to dpo_gdpr@unimarconi.it, or by calling the customer center at **+39-06-377251**.

Withdrawal of consent will result in the **cessation of marketing communications via chat**, without affecting the lawfulness of processing carried out prior to withdrawal.

Filing a Complaint

The Data Subject has the right to **lodge a complaint with the supervisory authority** of their country of residence.

Refusal to Provide Data

The information requested is necessary for the functioning of the **chat and/or gaming platforms** in order to allow operators of Università degli Studi Guglielmo Marconi to provide personalized assistance, respond to user requests, and monitor and improve the quality of the service.

The University does not use information obtained through the chat platform for marketing purposes except where **specific consent has been given**.

Providing data is **optional**, but failure to provide such data will make it **impossible to process requests and provide assistance**.





UNIVERSITÀ DEGLI STUDI GUGLIELMO MARCONI

Automated Decision-Making Processes

The Data Controller carries out the above-mentioned processing activities **only following an explicit request submitted by the Data Subject.**

Via Plinio 44 - 00193 Roma

Tel. +39 06 377251

www.unimarconi.it

info@unimarconi.it

Codice Fiscale e Partita IVA: 07154361005

