



DATA PROTECTION REGULATION DATA RETENTION POLICY ANNEX

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Data Retention Policy

Type of Treatment	Purpose of Treatment	Period of conservation	Main normative references
Orientation	The data is treated for	The data can be	Art. 5(e) of Reg
university	favour actions of accompaniment e	archived and maintained for a maximum period	EU 2016/679 Art. 99 Legislative Decree 196/2003 thus
	monitoringatteapreventing dispersionschool. Thedataaretreaties,forexample,in context of:registrationateventsorientation;participation in interviewsindividualoforientation;sendingoforientation;sendingoforientation;sendingoforientation;sendingoforientation;sendingoforientationonewcourses;improvementofofreductionofofreductionof abandonment,alsovia pathssending	of 10 years evaluated on the base of term maximum duration of the path university referred to individual concerned	as integrated e amended by Legislative Decree 101/2018
Education delivery and career management (from matriculation to graduation)	The data is processed to enable the management of student career events such as study plan management, exam registration and graduation application.	Unlimited	Art.1decreeministerial30May 2001 (G.U.175of30July2001)"Identificationofessentialcareer dataofstudents"
			Art. 5(e) of EU Reg. 2016/679
Internship and Job Placement		The data will be retained indefinitely but will be used for the purpose for which it is processed for no longer than 5 years after termination of student status	Art.1decreeministerial30May 2001 (G.U.175of30July2001)Identificationofcareer dataofstudents"
			Art. 5(e) of Reg.

			EU 2016/679
Disciplinary proceedings	Conduct of	Unlimited for	
	disciplinary proceedings	final measures	
		r vern for	//
		5 years for revoked or annulled measures	
Legal proceedings	Fulfil specific obligations or perform	10 years after termination of the	Art. 9 c. 2 of EU Reg 2016/679
	specific tasks provided for by laws, European Union legislation,	relationship/contract/ exhaustion of	Garante Authorisation No. 7/2016
	regulations or collective agreements,	treatment	,
	including company agreements, for the sole purpose of managing the		
	employment relationship.		
	To assert or defend in		
	judicial venue a right.		
Management financial e	Treatment carried out	10 years	Art. 2220 c.c.
administrative	for activities	10 years	Art. 2220 C.C.
auministrative	administrative-accounting,		
	i.e. connected to		
	performance of activities		
	of nature organisation,		
	administrative,		
	financial and accounting,		
	functional		
	to the fulfilment of		
	obligations contractual obligations		
	e		
	tax i.e. activities		
	administrative, treasury		
	e control of management		
	(invoicing active e		
	liabilities, balance		
	sheet,		
	accounting,		
	customer administration and		
	suppliers, control of		
	management e treasury).		
	Treatment aimed at		
	payment of		
	emoluments.		
	Treatment finalised		
	the granting of refunds		
	towards students, as well as		
	verification of payments		
	towards the University		

Human Resources	Treatment carried out for activities administrative-accounting, i.e. related to the performance of activities of nature organisational internal, functional activities	Libro Unico del Lavoro (LUL, formerly Libro matricola): 5 years since the last registration. Accident register: 4 years since the last registration.	Art. 2220 c.c. Ministerial Decree 9 July 2008 Article 6(2)
	the fulfilment of contractual and pre-contractual obligations with reference to the employment contract, relating to the management of the employment relationship in all its phases (trade union, social security, health, hygiene and safety at work); in detail activities of administration pers onnel administration, attendance recording, interface with external social security and welfare institutions and labour consultants, attendance recording activities. Recruitment activities (search for potential employees and selection interviews).	Other personal data of employees: unlimited. Candidates' personal data: maximum 12 months after collection.	

	Management of the corporate		
IT Information Systems	Management of the corporate information system. Application of minimum security measures. Maintenance and support with respect to software, hardware, e- mail and servers.	 Domain user deactivation: immediate upon termination of employment. Deactivation of the employee: immediate upon termination of employment. Accounts traceable to identified or identifiable persons must be removed after deactivating of them and the simultaneous adoption of automatic systems aimed at informing third parties and providing them with alternative addresses referring to the data controller's professional activity. Contents of terminated employee e-mail messages: for a time commensurate with the ordinary needs of managing the e-mail services services, including system security needs, for a maximum period of 24 months. 	Art. 2220 c.c. Provision of the Garante on waste by electrical equipment an d electronic equipment (WEEE) and data security measure of 13/10/2008. Access to e-mail of employees - 22 December 2016 (Provision of the Supervisory Authority).
		 Data that are processed for administrative accounting purposes: maximum 10 years. Administrators' system logs (logical accesses): 6 months. Delete and Insert link to the LOG Policy Life cycle of digital identities 	
Promotion of the Athenaeum (Marketing and Events)	The processing is aimed at the promotion of events and initiatives promoted by the Athenaeum. The	- Treatment data performed a purposes of marketing direct: 24 months after the collection of the	

	processing is aimed at the management of conferences, events organised by the University. Processing carried out for marketing purposes direct i.e.	consensus. Processing data for dissemination purposes: - Employees: - following the termination of the employment relationship, for	//
	sending material advertising or sales	what concerning the dissemination on websites,	
	direct o by the	social network pages	
	completion of research of	images will remain	
	market o of	on such channels and in the	
	communication	archives of the holder of the	
	commercial e-mails, telephone calls, SMS, MMS. Processing of dissemination of personal data (name surname, photograph, video)	treatment for the period of time needed for the University to update the platforms, which will not exceed 3 years (estimated time for	
	via publication	periodic review of these	
	on domain-based websites, social media	channels) with next removal; - following of termination of	
		employment relationship until ad exhaustion of stocks of material	
		product (e.g. brochure, catalogues, leaflets) that contain the image.	
		At next sample production	
		the image will no longer reproduced on the material	
		in object.	
Digital Identity Management	Creation of a temporary digital	At the establishment of the	
temporary	identity of those who intend to starting a relationship with the	relationship with the University (transition to the status of student or employee e.g.) or after	
	university or intending to access its services (e.g. future students, future teaching or technical-administrative staff, future collaborators). In in particular, i data will be processed to allow upon stabilisation of the relationship with the University (completion of enrolment,	6 months.	
	recruitment, etc.) the issue of definitive University credentials (University account) access and the use of online services.		