

PRIVACY NOTICE – B4i

We inform you that your personal data will be processed in compliance with the legislation on the protection of personal data (Regulation (EU) 2016/679, “**GDPR**”), and Italian Legislative Decree 196/2003 and ss.mm.ii. (“**Privacy Code**”).

1. Data controller

The data controller is the Università Commerciale Luigi Bocconi, with registered office in Via Sarfatti 25, 20100 Milano (MI) (“**Bocconi University**” or “**Controller**”).

2. Data Protection Officer

Bocconi University has appointed a *Data Protection Officer* (“**DPO**”) who can be contacted at the following e-mail address: dpo@unibocconi.it.

3. Processing of personal data

PURPOSE OF PROCESSING	LEGAL BASIS	PERSONAL DATA PROCESSED	RETENTION PERIOD
a) Application management for Bocconi University's entrepreneurial hub, namely Bocconi for innovation (“ B4i ”)	Performance of a contract to which the data subject is party (Art. 6(1)(b) GDPR)	• personal details • tax code • <i>curriculum vitae</i> • professional profile (including actual role within the start-up)	The data will be kept for two years from the outcome of the selections
b) B4i roll-out (management of pre-acceleration and acceleration programs), including responding to your particular queries related to B4i and granting you access to the Controller's library	Performance of a contract to which the data subject is party (Art. 6(1)(b) GDPR)	• Data mentioned under letter a) • Identity document and tax code • Ownership share of the start-up admitted to B4i	The data will be kept for the entire duration of the relevant B4i programme and for any additional time required to complete it

PURPOSE OF PROCESSING	LEGAL BASIS	PERSONAL DATA PROCESSED	RETENTION PERIOD
c) Managing Mentor or Alumnus Angel applications and awarding the relevant title	Execution of pre-contractual measures taken at the request of the data subject (Art. 6(1)(b) GDPR)	• Master data • Professional title • Role within start-up • Professional experience: skills and expertise from sector • Bocconi alumnus status	The data will be kept for as long as the qualification is maintained
d) Subscription to the newsletter by filling in the form available online on the Bocconi University site	Consent given by the data subject (Art. 6(1)(a) GDPR)	• First name • Last name • e-mail address	Until withdrawal of consent
e) Contacting the person who participated in the relevant B4i programme in order to obtain feedback on the progress of the business activity	Performance of a contract to which the data subject is party (Art. 6(1)(b) GDPR)	• First name • Last name • e-mail address • Professional title	Until the data subject expressly objects to receiving such communications
f) For security and internal organization purposes.	Pursuit of the legitimate interest of the Controller (Art. 6(1)(f) GDPR). The processing of your personal data is based on our legitimate interest in protecting our systems and organizing B4i from a strategic standpoint.	• All the relevant personal data collected during B4i	Until the data subject expressly objects to such processing

PURPOSE OF PROCESSING	LEGAL BASIS	PERSONAL DATA PROCESSED	RETENTION PERIOD
g) For research and statistical purposes. This data can be processed both on not anonymous and aggregate basis and on an anonymous and aggregate basis.	Pursuit of the legitimate interest of the Controller (Art. 6(1)(f) GDPR). The processing of your personal data is based on our legitimate interest in assessing, monitoring and enhancing the quality, effectiveness, and relevance of B4i, also by ensuring that initiatives are grounded on factual and data-driven evidence.	• All the relevant personal data collected during B4i	Until the data subject expressly objects to such processing.
h) Execution of extraordinary corporate transactions involving B4i, including mergers, acquisitions, disposals, corporate reorganizations, and restructurings.	Pursuit of the legitimate interest of the Controller (Art. 6(1)(f) GDPR); and, to the extent a communication/transfer of data is needed as a result of the transaction, compliance with the law (Art. 6(1)(C) GDPR). In the first scenario, the processing of your personal data is based on our legitimate interest in carrying out extraordinary corporate operations. Such transactions are essential for the strategic development and continuity of our B4i programs and may require the evaluation, transfer, or integration of assets, including personal data.	• All the relevant personal data	For the period strictly necessary in the context of the corporate transaction, and afterwards limited to the purposes of complying with applicable legislation.

When the Controller processes your personal data under the contractual basis (Article 6(1)(b) GDPR), providing your personal data is required. If you do not provide the required personal data, you will not be able to apply and, if selected, join the relevant B4i programme.

When we process your personal data based on your consent (Article 6(1)(a) GDPR) you are free to provide us with your consent and to withdraw it at any time without affecting your possibility to join B4i programme.

When we process your personal data to pursue our legitimate interests (Article 6(1)(f) GDPR) you have the right to object at any time, on grounds relating to your particular situation. Please refer to Section 8 below for further information.

4. Methods of data processing

In relation to the aforementioned purposes, personal data are processed by means of manual, computerised and telematic tools in a manner strictly related to those purposes and, in any case, in such a way as to guarantee the security and confidentiality of the data, in addition to compliance with the specific obligations laid down by law.

No automated decision-making processes will be used during the processing operations.

5. Recipients of personal data

For the pursuit of the above-mentioned purposes, the personal data collected may be processed by:

- a) internal units within the University. Personal data will be processed by authorised personnel, pursuant to Article 29 of the GDPR and Article 2-*quaterdecies* of the Privacy Code;
- b) third companies appointed as Data Processors, pursuant to Article 28 of the GDPR, which supports the Bocconi University in organizing B4i (such as companies providing IT support; media agency);
- c) external consultants, mentors and other third parties involved in organizing B4i and supporting the Controller;
- d) entities that, directly or indirectly, exercise control or coordination over the Controller, or are subject to common control, direction, or significant influence within the same institutional or corporate constellation, insofar as such disclosure is instrumental to administrative, organizational, or governance purposes consistent with the Controller's legitimate interests;
- e) companies involved in extraordinary corporate transactions.

In any event, you may request further information by writing to the DPO at the addresses indicated in Section 2.

6. Withdrawal of consent

For the pursuit of the purpose set out in letter d) of the table in Section 3 of this privacy policy, you have the right to withdraw the consent you have given, at any time. This does not affect the lawfulness of the processing based on the consent before withdrawal. To withdraw your consent, simply contact the University at the addresses published in this privacy policy.

7. Data transfer outside the EU

The personal data collected will be transferred to third countries outside the European Economic Area and, in particular, to the United States of America. Any transfer of personal data will be carried out in compliance with Articles 44 et seq. of the GDPR, ensuring an adequate level of protection essentially equivalent to that ensured within the Union. For any further information (including the safeguards adopted and the means by which you can obtain a copy of them) you may contact, in writing, the Controller or the DPO at the above-mentioned addresses.

8. The rights of the data subject

You have the right to exercise the rights recognised by the legislation at any time, pursuant to Articles 15-22 of the GDPR. In particular, as a data subject, you have the right to obtain:

- a. confirmation as to whether or not personal data are being processed and access to the data and, among the others, the following information: purpose of processing, categories of personal data, recipients and/or categories of recipients, storage period;
- b. rectification of inaccurate personal data and/or supplementation of incomplete data, including by providing a supplementary declaration;
- c. deletion, in the cases provided for by the GDPR;
- d. the restriction of processing in the cases provided for by the privacy legislation in force;
- e. data portability and, in particular, the possibility of requesting the direct transmission of processed personal data to another data controller;
- f. withdrawal of any consent given, without prejudice to the lawfulness of the processing based on the consent before revocation;
- g. objection, at any time, to the processing, pursuant to Article 21 of the GDPR, on grounds relating to your particular situation. The Controller will no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claim.

Without prejudice to any other administrative or jurisdictional recourse, you also have the right to lodge a complaint (Art. 77 GDPR) with the Italian Data Protection Authority (www.garanteprivacy.it), if you consider that the processing concerning you violates the regulations in force on the protection of personal data.

In order to exercise all the above-mentioned rights, you may contact the Controller or the DPO in writing at the above-mentioned addresses.