PRIVACY POLICY FOR PROCESSING OF PERSONAL DATA (no. 1339 of COVIP registry)

The data collected will be processed based on the following principles: propriety, lawfulness and transparency; a limitation of purpose; minimization of data; accuracy; a limitation of storage space; integrity and confidentiality. The personal data policy for the FONDO PENSIONE DEI PROFESSORI ORDINARI DI 1° FASCIA E DEI DIRIGENTI DELL'UNIVERSITA' COMMERCIALE "LUIGI BOCCONI" DI MILANO can be consulted at the fund website.

The Pension Fund for First Level Full Professors and Managers at Università Commerciale Luigi Bocconi (hereinafter, "Pension Fund"), with registered offices in Milan at Via Sarfatti 25, hereby declares that when applying the General Regulations on Data Protection no. 679/2016 regarding protection of personal data (hereinafter the "Law"), and, to that end, with reference to the use of the interested party's personal data (hereinafter "Data"), including data that is considered "sensitive" (in the broadest sense of the term provided for by the law) requested, acquired and provided by the interested party, hereby informs you of the following:

1 Type of Data Collected

The following types of personal data may be collected:

- Your name and contact information, such as address, email address and phone number, as well as your birth date, fiscal code and passport number or national ID card number, place of domicile and nationality;
- Personal data regarding any of your dependents or beneficiaries;
- You will be asked your profession (whether Professor or Manager);
- Data regarding your contribution;
- Date of your enrollment in compulsory social security;
- Health status in case of request for advance of healthcare expenses and redemption for permanent disability;
- Health status in case of services for disability or predecease.

In addition, if you take up an office and are appointed a member of the Board, further personal data required for performance of duties may be requested from you. These include measurements and accounting records, as well as data needed to verify the existence of the fit and proper requirements and the absence of grounds for ineligibility or forfeiture provided for by existing legislation.

2 Method of Processing Data

Data will processed in paper format or electronic format. In the latter case, automated tools will be used.

Data will be saved strictly and solely for the time and purposes for which it was collected.

Specific security measures are adopted to prevent data breaches, as well as to avoid illicit and/or incorrect uses of the same and unauthorized access.

3 Aims of Use of Data

Use is the solely aimed at allowing the Fund to perform its activities, including activities resulting from allocating the office of member of the Board. In particular, use regards:

- Performance of activities regarding the pursuit of aims of supplementary social security and activities connected to it, including accounting and administrative procedures and compliance implemented as established by the Fund's Statue and in compliance with Italian D. Lgs. no. 252/2005;
- Fulfilment of obligations provided for by European legislation, regulations or laws, as well as provisions given by public authorities empowered by them or supervisory bodies of which the Fund is subject;
- Verification of the existence of the fit and proper requirements and the absence of grounds for ineligibility or forfeiture provided for by existing legislation, if appointed to the Board;
- Administration of data, including measurements and accounting records, as well as fulfilment of obligations provided for by European legislation, regulations or laws, or provisions given by public authorities empowered by law and supervisory and regulatory bodies;
- In general, for the performance of all legal and contractual obligations;
- Performance of informational and promotional activities regarding the pursuit of aims of supplementary social security, not strictly attributable to the association relationship, when you have provided your explicit consent.

4 Movement and Communication of Data

- Employees of the Fund and members of the supervisory, administration and collegial bodies, as well as subjects authorized by law by virtue of their position may access the data.
- In addition, other subjects and external companies who perform only the activities needed to reach the abovementioned aims, including through outsourcing, may access the data, which the Fund has specifically appointed as supervisors or qualified to use the data.
- Access to the data is always connected to the purposes indicated above.
- In addition, the Data of the interested party may be communicated to third parties, for the aims set out in point 3:
- a) to authorities, as required by law;
- b) to public authorities and related tax collector and treasury offices, companies or banks that carry out particular services (e.g. payment services) for which data must be provided to allow the Fund to perform services and actions;

5 Granting of Data

Without prejudice to the personal autonomy of the interested party, granting of personal data may be:

- a) Compulsory for carrying out the aims established by the Fund's Statute
- b) Compulsory based on European legislation, regulations or laws, or provisions given by public authorities empowered by law and supervisory and regulatory bodies.
- c) Optional, but strictly necessary for the aims pursued by the Fund for management of related relationships.

Any refusals to grant the data requested and/or related consent to use will result in a failure to follow up with the application to enroll in the Fund, requests correlated to participation in the Fund, as well as failure to regularize the position of member of the Fund's Board. For the performance of informational and promotional activities, a refusal will not result in any consequences regarding the legal relationship of enrolling in the Fund, both during setup and when in place, but it impedes the Fund from performing such activities.

6 Legal Basis for Processing Data and How Data Is Used

We can process your personal data because:

- It is required for performing and fulfilling the aims pursued by the Pension Fund;
- Auxiliary activities must be performed;
- It is required for our legitimate interests and those of third parties, including security measures and measures for internal organization and institutional communications;
- Your consent has been given;
- A legal obligation must be complied with.

7 Transfer of Data Abroad

Personal data may be transferred to the categories of subjects indicated in point 4 towards third countries in relation to the European Union:

- For the aims set out in point 3 and to be subject to processing having the same aims and obligations by law, as they are strictly in the remit regarding the specific relationship between the interested party and the Funds;
 - When transfer is subject to one or more guarantees deemed appropriate for international transfers required by the applicable law (e.g. standard clauses on the protection of data adopted by the European Commission);
 - A decision by the European Commission that provides that the country or territory toward which the transfer is made guarantees an adequate level of protection; or
 - Another situation in which transfer is permitted by the applicable law (e.g. if we have your explicit consent).

8 Rights of the Interested Party

As the interested party of use, you have the right to:

- Request a correction of your personal data if it is incorrect;
- Request that it be deleted;
- Request its transformation in anonymous form or block data processed in violation of the law, including those for which keeping data is not necessary regarding the aims for which data was collected or subsequently processed;
- Request the personal data you have provided, including for the purposes of communicating such personal data to another data controller;
- For reasons related to your particular situation, object to any of our particular processing activities in which you deem that it would have a disproportionate impact on your rights.

Please note that the abovementioned rights are not absolute and we may have the right to refuse requests in which exceptions are applied.

9 Data Controller

The data controller is the Pension Fund for First Level Full Professors and Managers at Università Commerciale Luigi Bocconi, registered in the COVIP Registry with number 1339.

10 Contact Information

For any questions on this privacy policy or how we process your personal data, please contact the supervisor for data protection through the email available at this link (LINK).

Having read the policy mentioned above and received the information included therein,	I hereby
declare I have read and understood the content.	

It shall remain established that this consent is subject to compliance with the provisions in	
existing legislation.	

(Place and date)	(Print full name of the interested party)