# Privacy Policy: Student Housing Italy LLC (Comforts of Italy / Alumni Study Abroad)

## 1. Who we are and what this policy covers

Student Housing Italy LLC ("SHI LLC", "we", "us") is a Delaware limited liability company. We operate Alumni Study Abroad ("ASA"), including the Renaissance Immersion (Florence) and Eternal City Immersion (Rome) programs, and we provide student housing and related services to US universities and study abroad programs.

This policy explains how we collect, use, share and protect personal information of:

- applicants, enrolled participants and alumni of ASA programs;
- students placed in our housing through a university or program partner;
- staff and contacts at partner universities and institutions;
- prospective participants who contact us, subscribe to our mailings or respond to our advertising; and
- visitors to our websites, including alumnistudyabroad.com.

**Our Italian service provider.** In-country services in Italy (apartments, check-in, housekeeping, maintenance, local support and emergency assistance) are delivered by our affiliate Specialty Housing Italy SRL, operating as Comforts of Italy ("SHI SRL"). SHI SRL processes your information on our behalf for these services. For certain legal obligations in Italy, such as guest registration with the police and local tourist tax, SHI SRL acts as an independent controller under its own privacy notice, available on request.

**Contact.** Student Housing Italy LLC, 505 W. 35th St., New York, NY 10001, USA. Privacy inquiries: info@alumnistudyabroad.com.

## 2. Information we collect

| Category | Examples | Source |
|---|---|---|
| Identity and contact | Name, date of birth, gender, email, phone, mailing address, nationality | You, your university or program |
| Travel documents | Passport number, issuing country, expiry date, copy of passport photo page | You (required for Italian guest registration) |
| Program and enrollment | Application answers, program choice, dates, course and language level, roommate and housing preferences, signed agreements | You, your university or program |
| Payment | Amounts paid, invoices, payment method type, last four digits of card, bank transfer references | You; payment processors (we do not store full card numbers) |
| Health and accessibility | Dietary needs, allergies, medical conditions or disabilities you choose to disclose so we can accommodate you or respond in an emergency | You, with your explicit consent |

| Category | Examples | Source |
|---|---|---|
| Emergency contacts | Name, relationship and phone number of the person you nominate | You (please tell them you have shared their details) |
| Insurance | Travel or health insurance provider and policy number | You, your university |
| Stay and incident records | Arrival and departure, apartment assigned, maintenance requests, damage reports, incident and safety reports | You, SHI SRL staff |
| University partner contacts | Name, title, institution, work email and phone | The partner institution |
| Marketing and lead data | Name, email, interests, responses to our ads and emails, how you heard about us | You; advertising platforms such as Meta and Google when you submit a lead form |
| Website and device data | IP address, browser type, pages visited, referring site, cookie identifiers | Automatically, through cookies and similar tools (see Section 7) |
| Photos and testimonials | Program photos, video, reviews you provide | You or our staff, with your permission |

If you do not provide information marked as required in an application or agreement, we may be unable to enroll or house you. Italian law requires passport details for every guest; we cannot provide accommodation without them.

## 3. How we use information

We use personal information only for the purposes below. Where the EU General Data Protection Regulation ("GDPR") applies, the legal basis for each purpose is shown in parentheses.

1. To process applications, enroll you, arrange housing, courses, excursions and activities, and perform our agreement with you or your university (contract).
2. To take payments, issue invoices and keep accounting and tax records (contract; legal obligation).
3. To meet Italian legal requirements for accommodation, including guest registration with the Polizia di Stato and municipal tourist tax, carried out through SHI SRL (legal obligation).
4. To accommodate dietary, medical or accessibility needs and to respond to emergencies (explicit consent; vital interests where you cannot consent).
5. To report to your home university or program on attendance, housing, conduct and incidents, as set out in its agreement with us (contract with the institution; legitimate interests).
6. To communicate with you before, during and after your program, including safety alerts (contract; legitimate interests).
7. To send information about future programs and our newsletter (consent, or legitimate interests for past participants, with an opt-out in every message).
8. To measure and improve our advertising and website, including through the Meta pixel and Google analytics tools where you have accepted cookies (consent).
9. To use photos and testimonials in our materials (consent, which you may withdraw at any time for future use).
10. To protect the safety of participants and property, investigate incidents, enforce our terms and handle claims (legitimate interests; legal obligation).

We do not sell personal information. We do not use it for automated decision-making that produces legal or similarly significant effects on you.

## 4. Who we share information with

We share personal information only as needed for the purposes in Section 3:

- **SHI SRL (Comforts of Italy)**, our Italian affiliate, which delivers housing and in-country services under a written data processing agreement.
- **Your home university or program**, if you were placed with us through one. We share what the institution's agreement with us requires, such as arrival confirmation, housing assignment, incident reports and conduct matters. Information the institution sends us from your education records is used only for the purpose for which it was provided and is not disclosed further except as the institution permits or the law requires.
- **Program partners in Italy**, such as language schools, instructors, guides, transport and excursion operators, who receive only the details needed for their part of the program (typically name, dates and relevant dietary or accessibility needs).
- **Service providers** who host our website, email and files, process payments, run our email marketing platform, manage advertising, or provide accounting, legal and insurance services. They may use the information only to provide services to us.
- **Advertising platforms** such as Meta and Google, when you submit a lead form on their platforms or accept advertising cookies on our site.
- **Authorities**, including the Italian police (guest registration) and municipal tax offices, and any court, regulator or authority where the law requires, or where needed to protect someone's life, safety or legal rights.
- **Emergency services and medical providers**, and your emergency contact, if we reasonably believe you are at risk.
- **A successor business**, if all or part of our business is merged, sold or reorganized, including within our group of affiliated companies. The successor must honor this policy for information collected under it.

## 5. International transfers

Our programs take place in Italy, so your information is transferred from the United States to Italy and processed there by SHI SRL and our Italian partners. Once in Italy, it is protected by the GDPR and Italian data protection law.

Information that SHI SRL or Italian partners send back to us in the United States (for example, incident reports, stay records and invoices) is protected by Standard Contractual Clauses approved by the European Commission, in our agreement with SHI SRL. You may request a copy of the relevant safeguards by contacting us.

Some of our service providers (for example, email and cloud storage providers) may process information in other countries. We use providers that apply safeguards recognized under applicable law.

## 6. Retention, security and minors

**Retention.** We keep personal information only as long as needed for the purposes in Section 3:

| Record | Retention |
|---|---|
| Application, enrollment and stay records | Duration of the program plus 7 years, to handle claims and university audits |
| Accounting and tax records | As required by US and Italian tax law (up to 10 years in Italy) |
| Health, dietary and accessibility information | Deleted 90 days after the program ends, unless linked to an incident or claim |
| Passport copies | Deleted 90 days after the program ends, unless the law requires longer |
| Unsuccessful applications and inquiries | 2 years from last contact |
| Marketing lists | Until you unsubscribe or 3 years without engagement |
| Incident and safety reports | 7 years, or longer if a claim is pending |

**Security.** We use access controls, encrypted connections, password protection and limited staff access to protect personal information. Health information and passport copies are restricted to staff who need them. We do not enter passport information, dates of birth, health or accessibility information, or information provided by your university into AI tools. No system is completely secure; if a breach affects your information, we will notify you and authorities as the law requires.

**Minors.** ASA programs are for adults, and our housing is intended for students aged 18 and over. If a university places a student under 18 with us, we rely on the university to obtain parental consent and will handle that student's information under the university's instructions. We do not knowingly collect information online from children under 13.

## 7. Your rights and choices

**Everyone.** You may ask us to confirm what personal information we hold about you, provide a copy, correct it, or delete it where we no longer need it. Email info@alumnistudyabroad.com. We will respond within 30 days (45 days where US state law allows) and may need to verify your identity. We will not discriminate against you for exercising your rights.

**Marketing.** You can unsubscribe from marketing emails using the link in any message or by emailing us. Service messages about a program you are enrolled in will continue.

**US state privacy rights.** Depending on your state of residence (for example California, Colorado, Connecticut, Virginia and others), you may have additional rights: to know the categories and specific pieces of information we collect, to correct and delete it, to opt out of "sale" or "sharing" of personal information for targeted advertising, and to limit use of sensitive information. We do not sell personal information for money. Our use of advertising cookies and pixels may count as "sharing" under some state laws; you can opt out through our website's cookie settings or by enabling a Global Privacy Control signal in your browser, which we honor. You may use an authorized agent to make a request. If we deny your request, you may appeal by emailing info@alumnistudyabroad.com with "Appeal" in the subject line.

**If you are in the EU or UK, or while you are in Italy.** Under the GDPR you also have the right to restrict or object to processing (including processing based on legitimate interests), to data portability, and to withdraw consent at any time without affecting earlier processing. You may complain to the Italian data protection authority, the Garante per la protezione dei dati personali (www.garanteprivacy.it), or the authority where you live or work.

**Cookies.** Our website uses cookies that are strictly necessary for it to work, and, only with your consent, analytics and advertising cookies (such as Google Analytics and the Meta pixel). You can change your choices

at any time through our website's cookie settings or your browser settings. Refusing non-essential cookies does not affect your ability to use the site or apply.

## 8. Changes and contact

We may update this policy from time to time. We will post the new version on our website with its effective date and, for material changes, notify enrolled participants and partner institutions by email.

Student Housing Italy LLC, operating Alumni Study Abroad

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