



UNIVERSITÀ DEL PIEMONTE ORIENTALE

INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLES 13 AND 14 OF EU REGULATION 2016/679

Dear Student,

this information is provided to you not only to fulfil the obligations imposed by the Laws in personal data protection - Regulation (EU) 2016/679 (hereinafter "GDPR"), Legislative Decree 196/2003, as updated by Legislative Decree 101/2018 (or "Code for the protection of personal data") and the relevant provisions of the Guarantor Authority for the protection of personal data - but also because the University of Eastern Piedmont "Amedeo Avogadro" (later also "**University**" or "**Uniupo**") believes that the protection of personal data is a fundamental value of their own business and wishes to provide any information that can help you protect your privacy and to control the use that is made of personal data.

Personal data is information relating to an identified or identifiable physical person defined as "interested party" (hereinafter also "**Student**"), such as personal data, the information relating to economic conditions, state of health, lifestyle, etc.

For information on personal data processing aimed at determining the score and/or the position in the ranking (with possible assignment at the University) in the context for enrolment in a national limited attendance degree course, please refer to the specific and further information from the Ministry of University and Research.

Data Controller and Data Protection Officer (or "DPO")

Data Controller, i.e. the subject who determines the purposes and means of the personal data processing that you can contact to exercise the rights recognized by the GDPR, is the University of Eastern Piedmont "Amedeo Avogadro", VAT no. 01943490027, Tax Code 94021400026, registered office in Via Duomo, n. 6 - 13100 Vercelli.

The Data Controller can be contacted by sending an email to the address

affarigiuridici@uniupo.it

The University has designated a Data Protection Officer (DPO), who can be contacted at the address

dpo@uniupo.it

Sources and categories of data processed, nature of data provision and methods of treatment

The personal data being processed are mainly collected from the Student. During the registration procedures, data relating to family members or persons living with the Student may be required (for example the personal details of these subjects). In relation to these data, it is the duty of the Student to proceed to communicate the contents of this information to these subjects.

In such cases, the treatment by the University will be limited only to the strictly necessary operations to achieve the processing purposes indicated in this informative. The University processes the following categories of data referable to the Student:

- **common data:** personal data (name, last name, date and place of birth, citizenship, tax code, address of residence and/or domicile), contact details (telephone number, e-mail address);
- contacts, visas/residence permits for non-EU students;

- photocopy of the identity document and tax code in order to verify the student's personal details;
- copy of the qualification required to enter the course of study;
- copy of a passport photo to be applied on the student's badge.

The University also deals with **personal data of the Student belonging to particular categories** referred to in art. 9 of the GDPR, such as data that make it possible to detect racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data relating to the health or sexual life or sexual orientation of the person (e.g. racial and ethnic origin for non-EU citizens, refugee status or health data for disabled students).

The University may also process data relating to student criminal convictions and offenses, for example in the case of students in prison, for the definition of the methods of carrying out teaching activities and administrative practices relating to enrolment and career management. The provision of data by the Student is mandatory to allow the University to correctly establish and manage enrolment procedures and to grant the student to enrol and attend the University. Any refusal to provide such data involves the impossibility for the University to correctly manage these aspects and therefore the impossibility of enrolment for the student.

The processing of personal data takes place in compliance with the laws on personal data protection, through manual, paper, IT and telematic tools in order to guarantee data security and confidentiality with particular attention to organizational and technical security measures.

Purpose and legal basis of the processing.

The personal data provided will be processed for:

a) Purposes related to the correct execution of the contract or pre-contractual measures adopted at the request of the Student (legal basis: Art. 6 (1) (b) GDPR)

The following activities fall within this processing purpose:

- verification of the existence of the requisites required for participation in the procedure selection for enrolment in restricted access degree courses and absence of causes impediments to participation;
- determination of the score and position in the ranking (with possible assignment at the University);
- processing of the contribution bracket, treatment which includes the automatic download of data ISEE from INPS in order to
 - elaborate the student's contribution bracket proportionate to income
 - allow the calculation of the amount of the fees due by the Student;
- enrolment and attendance of university courses in person and in e-learning mode;
- management of the university career and achievement of the qualification;
- management of curricular and extra-curricular internships;
- calculation of fees and/or due refunds and exemptions;
- use of telematic and e-mail services;
- use of library services;
- access to laboratories and other protected structures;
- sending communications relating to one's university career;
- disciplinary proceedings against students;
- elections of students' representatives and for the eventual performance of the tasks concerning the elected office held by the student in the governing bodies of the University;
- management of activities aimed at obtaining the qualification to exercise the professions (State exams)
- provision of orientation and tutorial services

b) Purposes related to the fulfilment of legal obligations (legal basis: Art. 6 (1) (c) GDPR)

The following activities fall within this processing purpose:

- application of safety measures in the workplace according to the provisions of Legislative Decree 81/2008;
- archiving and storage of data relating to the university career (studies, positions held, academic qualifications);
- participation in competition procedures to obtain services on individual request provided by the University;
- processing of legal data;
- transmission to the Revenue Agency of the data relating to university expenses incurred by students for the attendance of study courses as well as the reimbursements paid, for the purpose of processing the pre-filled declaration;
- transmission to the Casellario, the database of subsidised social benefits, set up at the National Social Security Institute (INPS) of the data relating to the subsidized social benefits provided to students (such as, for example, benefits for tuition fees that are conditional on the ISEE or exemptions from fees due to specific circumstances, such as in the case of disabled students).

c) Purposes based on the legitimate interest of the University (legal basis: Art. 6 (1) (f) GDPR)

The following activities fall within this processing purpose:

- surveys for the teaching evaluation and for *customer satisfaction*;
- statistics, on aggregate or anonymous data, without the possibility of identifying the Student;
- recording of videos and images made by the video surveillance system (CCTV) in order to guaranteeing the safety of the University and protecting people and property;

d) Purposes based on public interest (legal basis: Art. 6 (1) (e) GDPR and Art. 2-sexies D. Lgs. 196/2003)

The following activities fall within this processing purpose:

- processing of particular data, i.e. data relating to racial and ethnic origin (for citizens non-EU citizens, and for refugee status);
- treatments related to the state of health (for students with disabilities) for access to support tools for enrolling procedures and for carrying out exams and didactic activities.

The legal basis of the processing, pursuant to art. 6, paragraph e) of the GDPR as well as of the art. 2 sexies, paragraph 2) of Legislative Decree 196/2003 and subsequent amendments is the need to fulfil public interest tasks entrusted to the Data Controller. The University, as a primary location for higher education and research, operates in implementation of art. 33 of the Constitution and art. 6 of the law n. 168/1989 and subsequent amendments and Statute of the University of Eastern Piedmont “Amedeo Avogadro”. With regard to non-EU citizens and refugees the University operates in implementation of the DPR 31 August 1999 n. 394 and of the law of 24 July 1954, n. 722 “Ratification and execution of the Convention relating to refugee statute, signed in Geneva on 28 July 1951”. As for the students disabled, the University operates in implementation of L February 5, 1992 n. 104, of the L. 8 October 2010 n. 170 and the Ministerial Decree of 12 July 2011 “Specific Learning Disabilities Guidelines”. Under of the legislation cited in this paragraph, the processing carried out without consent on the data belonging to particular categories indicated at the time of submission of the admission application to access the support tools for enrolling procedures and the carrying out of exams and didactic activities must be considered lawful pursuant to art. 9 (g) of the Regulation. The legal basis of the treatment, pursuant to art. 6, paragraph b) and c) and f) of the GDPR, may also be the need to fulfil in execution of a contract to which the person concerned is a party or in the execution of pre-contractual measures adopted at the request

of the interested party, the need to fulfil a legal obligation to which the data controller is subject and the legitimate interest of the owner for the improvement of the offered services.

Communication and dissemination of data for orientation, training and insertion purposes professional based on the authorization given by the interested party (legal basis: authorization of the interested party - Article 96 of Legislative Decree 196/2003)

As required by art. 96 of the Code regarding the protection of personal data, in order to facilitate orientation, training and professional placement of students, including abroad, the student can authorize the University to communicate or disseminate, even to private individuals and via computer, data relating to educational, intermediate and final outcomes and other relevant personal data in relation to the purposes of orientation, training and professional placement, excluding the data of particular nature and relating to criminal convictions and criminal offenses. This authorization can be revoked at any time, without prejudice to the processing that took place prior to the revocation, by forwarding a communication to the Data Protection Officer at dpo@uniupo.it.

Any recipients or any categories of recipients of personal data and transfer of personal data in a third country or outside the European Economic Area (EEA).

The data may only be accessed by duly instructed authorized persons (also with regarding compliance with security measures and confidentiality obligations) pursuant to art. 29 GDPR and 2-quaterdecies of the Code for the protection of personal data (for ex.: employees of the University who deal with the management of related administrative aspects to enrolment procedures).

Professionals and consultants appointed by the owner, as independent data controllers or responsible pursuant to art. 28 GDPR, will be able to further access the data.

In particular, the following people will be able to access the data:

- Members of the Examining Commissions
- MIUR
- certifying administrations, when checking the substitutive declarations made for the purposes of DPR n. 445/2000;
- local authorities, for the purpose of any subsidies to particular categories of students; Advocacy of the State, Ministry of Foreign Affairs, Police Headquarters, Italian Representations abroad, relatively to residence permits or to the recognition of particular status;
- Judicial authority;
- to private subjects, at the request of the interested party, to confirm the presence of any qualifications.

The management and storage of personal collected data takes place at the University and/or at suppliers of services necessary for the technical-administrative management who, for the sole purpose of the requested service, may become aware of the personal data of the interested parties with whom an agreement has been concluded for the data processing pursuant to art. 28 of the GDPR (for example CINECA Interuniversity Consortium, as provider of the ESSE3 service).

To obtain an updated list of subjects who may become aware of personal data, it is possible to send a communication by email to the DPO dpo@uniupo.it, specifying the reason for the request.

The data will not be disclosed and will not be transferred to a third country (or located outside the European Economic Area) or to an international organization.

If it is necessary to transfer the data to a third country located outside the European Economic Area (such as for the management of international Erasmus programs) the University guarantees that this transfer will

take place only in the presence of a decision of adequacy of the European Commission or other adequate guarantees required by the Laws in personal data protection (such as the stipulation of standard contractual clauses with the subject who will receive the data).

Data retention period

In compliance with the principles of proportionality and necessity, personal data will be stored in a form that allows the identification of the interested parties for a period of time not exceeding the achievement of the purposes for which they are treated. Personal data relating to the registry and the data relating to rankings or records are kept indefinitely over time, also for historical based interest on the archiving obligations imposed by current legislation (Presidential Decree 445/2000, Legislative Decree 42/2004, DPCM 3 December 2013).

The retention of personal data is also determined on the basis of criteria available within the guidelines provided by CODAU (Association made up of Directors general of the Italian university administrations), in particular the student registry and career data are kept indefinitely over time by the University the retention of the remaining data depends on the storage time of the administrative acts containing them. Documents in which test questions or answers are printed (for admission tests to courses with local or national limited access) are kept for 5 years. Further related documentation career is kept on the basis of the provisions established in the Policy of conservation drawn up by the University.

Rights of the interested party

The exercise of the rights indicated in this section is not subject to any formal constraint and is free of charge, except for manifestly unfounded or excessive requests, pursuant to art. 12 (5) of the GDPR. In relation to the treatments described in this information and pursuant to the GDPR, the Student can exercise the following rights:

- right of access to personal data and to all information referred to in art. 15 of the GDPR;
- right to rectify inaccurate personal data and the integration of incomplete ones;
- right to cancel their data, except for those contained in documents that must be compulsorily kept by the University and unless there is a prevailing legitimate reason to proceed with the treatment;
- right to restriction of processing where one of the hypotheses referred to in art. 18 of the GDPR applies;
- right to object to the processing of personal data, without prejudice to the necessity and obligatory nature of the processing for the purpose of establishing the relationship;
- right to revoke any consent given for non-mandatory processing of data, without thereby compromising the lawfulness of the processing based on the consent given previously of the revocation.

The interested party also has the right to file a complaint with the Guarantor for the Protection of Personal Data (www.garanteprivacy.it) or to the Guarantor Authority of the EU state in which the interested party habitually resides or works, or the place where the alleged violation occurred, in relation to a treatment that they consider non-compliant.

For all these requests, the Student can contact the University of Eastern Piedmont "Amedeo Avogadro" by sending a communication by traditional mail at the address Via Duomo, n. 6 - 13100 Vercelli or by email at affarigiuridici@uniupo.it, or by contacting the DPO at dpo@uniupo.it.



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Authorization for the communication and dissemination of data pursuant to Art. 96 of the Code of protection of personal data

The undersigned (name) _____
(last name) _____
(Code Tax) _____ in order to facilitate orientation, training
e professional placement, even abroad, pursuant to Art. 96 of the Code regarding personal data protection

Authorize

Does not authorize

the University to communicate or disseminate, including to private individuals and electronically, data relating to educational, intermediate and final outcomes and other relevant personal data in relation to the purposes of orientation, training and professional placement, excluding the data of particular nature and relating to criminal convictions and criminal offenses.

This authorization can be revoked at any time, without prejudice to the processing that took place prior to the revocation, by sending a communication to the Data Controller or to the Data protection officer at dpo@uniupo.it.