



IUSS

Scuola Universitaria Superiore Pavia

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF USERS for distance learning activities (Pursuant to EU Regulation 2016/679)

Pursuant to Article 13 of the EU Regulation 2016/679 ("GDPR") on the protection of individuals with regard to the processing of personal data and on the free movement of such data, IUSS School informs users about the use of their personal data for the carrying out of training and teaching activities with the aid of distance communication tools.

Data controller and data protection officer (DPO)

Data controller is IUSS School represented by the Rector (headquarter Piazza della Vittoria n. 15, 27100 Pavia – PEC diram@pec-iusspavia.it).

IUSS School has appointed a Data Protection Officer (headquarter Piazza della Vittoria n. 15, 27100 Pavia – Tel. 0382375876 – email: dpo@iusspavia.it – PEC diram@pec-iusspavia.it).

The internal processor

The Internal Data Processor of Scuola Universitaria Superiore IUSS is the General Director Ing. Giuseppe Conti. Contact details are: headquarters Piazza della Vittoria n. 15, 27100 Pavia, Phone +39 0382-375859, Email direzione_generale@iusspavia.it, PEC direzione@pec-iusspavia.it

Purpose of processing and legal basis

The data will be processed by the IUSS School, as part of the pursuit of institutional educational purposes to deliver distance education services.

Specifically, through the use of e-learning platforms and/or applications and/or computer and digital tools made available by the School, the following services are provided by the teaching staff with the support of the administrative technical staff in telematic mode:

- recorded lectures
- interactive live lectures
- oral examinations
- final proofs ordinary courses
- final proofs doctoral courses

Data may also be processed to protect the security, integrity, confidentiality, of the School's assets and IT structure and fulfill all legal obligations.

Telematically administered exams/final exams.

As with the in-person examination, in order for the student to take the profit examination or final discussion of regular and doctoral courses electronically, it will obviously be necessary to see the image and hear the voice. By registering for the roll call, by way of example, the following data may be processed: e-mail, connection IP address, images of the surroundings



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and identification document, the conduct of the test and the evaluation of candidates (the files to be shared with the committee, chat).

The personal data of the members of a committee and the institutional e-mail of the IUSS School will also be used to enable the conduct of the examination session or final test electronically.

In order to ensure the publicity of the oral examination session/final exam, which is also mandatory for the purpose of transparency, fairness and impartiality in the conduct of the test, other users will be able to access the conduct of each exam in real time, in telematic mode. Access will be authorized by the committee to all students enrolled in the same roll/session, together with the committee, colleagues from the academic community and external parties who request it, who will be able to connect to the session link, all in viewing and listening only, reconstructing in the virtual classroom the behavior normally possible in the physical classroom.

The legal basis: art. 6(1)(e), (3)(b) and (9)(2)(g) of the Regulations and arts. 2-ter and 2-sexies of the Code also having regard to the specific needs of students with disabilities (see spec. art. 2(m) and (n)).

Categories of data

The personal data collected and processed are:

- a) those provided directly by users when applying online and registering for pre- and postgraduate courses;
- b) tax and salary data entered online when matriculating or enrolling in subsequent years, or provided for requirements related to the payment of tuition fees;
- c) The data provided by users from time to time in relation to the specific service requested;
- d) University career data;

It is within the students' discretion to opt out of attending classes and taking the exam in this mode, with the same consequences as opting out of taking the exam in person. Registration for the exam and participation in the videoconference implies acceptance to be videotaped for the purpose of service delivery.

Treatment methods

Data are collected in accordance with the principles of relevance, completeness and non-excessiveness in relation to the purposes for which they are processed. The personal data provided are processed in compliance with the principles of lawfulness, fairness and transparency, provided for in Article 5 of the GDPR, with the help of computer and telematic tools suitable for storing and managing the data themselves and, in any case, in such a way as to ensure security and protect the utmost confidentiality of the data subject. The data may possibly also be processed by means of paper media. The data will in any case be processed in accordance with the provisions of Article 32 of the GDPR to prevent data loss, illicit or incorrect



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use and unauthorized access and in accordance with the provisions of AgID Circular No. 2/2017 "Minimum ICT security measures for public administrations."

The IUSS School has agreements in place with Google, Microsoft and recently also Zoom to provide the solution that best fits the needs of the academic community.

Communication, dissemination and transfer of data

Personal data will be processed, in compliance with the relevant regulations in force, exclusively by the staff of this School, adequately trained and authorized to process personal data, according to the functions arising from the organizational chart. Data may also be processed by the adequately trained staff of the Data Processor, where present. External providers are contractually bound to proper data management, in accordance with the provisions of European legislation on the protection of personal data, including on the subject of security measures appropriate to the type of processing.

Data may be disclosed to administrative authorities to which they must be transmitted according to legal requirements.

Finally, data subjects' personal data are not transferred to third countries outside the EU or international organizations.

Data retention

Personal data will be processed for as long as necessary related to the proceedings, consistent with the fulfillments related to legal obligations and in accordance with regulations on the preservation of administrative records.

On-line examinations/final examinations: no video or audio recordings of the session will be made, which are not necessary for the purposes to be achieved, nor will any data be kept other than those necessary to ensure the smooth conduct of the examination and its verbalization, exactly as "in-person", for the only time useful for this purpose. Oral examinations (including final examinations of ordinary courses and doctoral courses) will not be recorded. At the end of final exams or profit exams, the virtual classroom will be deleted and with it the stored data that allowed participation (e-mail, IP address of connection).

Minutes will be taken electronically, with unlimited storage for university career management and in compliance with archiving requirements imposed by current regulations.

Data may be retained to fulfill legal obligations and for the defense and protection of the rights of the IUSS School for the period necessary to achieve the stated purposes for which the data were collected.

Rights of the Interested Party

Data subjects have the right to request from the data controller access to their personal data and the rectification or erasure thereof or the restriction of processing concerning them, or to object to processing (Articles 15 et seq. of EU Regulation 679/2016). The appropriate



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application is submitted by writing to Scuola Universitaria Superiore IUSS - Piazza della Vittoria n. 15, 27100 Pavia - PEC diram@pec-iusspavia.it . The application may also be submitted through the Data Protection Officer at . dpo@iusspavia.it

Data subjects who believe that the processing of personal data relating to them is taking place in violation of the provisions of the GDPR have the right to lodge a complaint with the Guarantor as provided for in Article 77 of the GDPR or to take appropriate legal action in accordance with Article 79 of the GDPR.

No automated processes, including profiling as referred to in Article 22(1) and (4) of the GDPR, will be adopted.

Profiling

The Owner does not use automated processes aimed at profiling.

Websites and third-party services

The platforms may contain links to other websites that have their own privacy policies.

Cookie

The e-learning services use cookies, indicated in the specific "cookies used" sections.

Audio and video recordings for personal purposes during distance learning activities

Users of the services made available by the IUSS School for teaching purposes are expected to use them responsibly, that is, by complying with the laws and other rules and procedures of the School, according to normal standards of fairness, good faith and diligence.

The recording of sounds and images through the use of personal instruments such as cell phones or other suitable equipment is permitted only for personal purposes and with respect for the fundamental rights and freedoms of the persons involved, particularly their image and dignity.

Recording of lectures is allowed only for personal use, while their dissemination without the prior consent of the person concerned is prohibited.

It is not possible to disseminate the data of other people without obtaining their consent. It should be noted that the dissemination and communication on the web -by way of example, social networks, blogs or video sharing platforms- of the recordings made during the online educational activity, fall within the scope of the legislation on personal data protection. The student will be considered the Data Controller and will be held accountable for the violation of obligations in accordance with current regulations.