

**INFORMATION ON THE PROCESSING OF PERSONAL DATA  
FOR INCLUSION IN THE ALUMNI PROJECT DATABASE  
(pursuant to EU Regulation 2016/679)**

Pursuant to Art. 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 Pavia School informs the interested parties regarding the management and processing of their personal data as a result of participation and inclusion within the database of the Alumni Project.

**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](mailto: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](mailto:dpo@iusspavia.it) – PEC [diram@pec-iusspavia.it](mailto:diram@pec-iusspavia.it)).

**Purpose of processing and legal basis**

Personal data are collected and processed for the management of the database related to the Alumni project, for sending informative communications of events and activities organized by the IUSS School and for the organization of networking events.

The processing of personal data carried out is legitimized by the following legal bases:

1. the data subject has given consent to the processing of his/her personal data for one or more specific purposes (Art. 6 par. 1 lett. a of the GDPR).

**Categories of data**

The personal data used for the fulfillment of the purposes of this information subject to processing are:

- personal data such as first and last name, academic background, employment status;
- contact data such as email address and telephone number.

Personal data will NOT be processed for commercial or marketing purposes or transferred to third parties.

**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 guarantee their security and protect the utmost confidentiality of the data subject. The data



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may possibly also be processed by means of paper media. In any case, the data will be processed in accordance with the provisions of Article 32 of the GDPR to prevent data loss, illicit or incorrect use and unauthorized access and in accordance with the provisions of AgID Circular No. 2/2017 "Minimum ICT security measures for public administrations".

The communication of data is not mandatory. However, refusal to communicate the requested data prevents the data subject from accessing the service.

### **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 the processing of personal data, according to the functions arising from the organizational chart.

The data may be processed by External Data Processors, specifically appointed pursuant to Article 28 of the GDPR for the performance of one or more activities related to the project.

The personal data of data subjects are not subject to dissemination or transfer to third countries outside the EU or international organizations.

### **Data Retention**

Personal data are retained according to the principle of necessity. Data will be kept until the data subject's consent is revoked. You can always request the deletion of your data and/or the discontinuation of sending commercial communications by sending a request to the Data Controller. The data will be kept in accordance with the regulations on the preservation of administrative records.

### **Rights of the data subject**

Data subjects have the right to request from the Data Controller access to and rectification or erasure of personal data or restriction of processing concerning them, or to object to processing (Articles 15 et seq. of EU Regulation 679/2016). The appropriate application is submitted by writing to Scuola Universitaria Superiore IUSS - Piazza della Vittoria n. 15, 27100 Pavia - PEC [diram@pec-iusspavia.it](mailto:diram@pec-iusspavia.it). The application may also be submitted through the Data Protection Officer, at [dpo@iusspavia.it](mailto:dpo@iusspavia.it)

Data subjects who believe that the processing of personal data relating to them occurs 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 pursuant to Article 79 of the GDPR.

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