

# INFORMATION ON THE PROCESSING OF PERSONAL DATA (Pursuant to EU Regulation 2016/679)

Pursuant to Article 13 of the EU Regulation 2016/679 ("GDPR") on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, the IUSS School informs data subjects regarding the collection of data for participation in organized events and ceremonies.

## Data controller and data protection officer (DPO)

The Data Controller is the Scuola Universitaria Superiore IUSS in the person of the Magnifico Rettore (headquarters Piazza della Vittoria n. 15, 27100 Pavia - PEC).diram@pec-iusspavia.it IUSS University School of Higher Education has appointed the Data Protection Officer in the person of Dr. Nadia Pazzi (headquarters Piazza della Vittoria n. 15, 27100 Pavia - Tel. 0382375876 - email: <a href="mailto:dpo@iusspavia.it">dpo@iusspavia.it</a> - PEC ).<a href="mailto:diram@pec-iusspavia.it">diram@pec-iusspavia.it</a>

## Purpose and legal basis for processing

Personal data are collected and processed for purposes related to the organization and conduct of IUSS School events.

The provision of data is necessary for the registration of the interested party to the event. The data collected during registration may also be used to inform the interested party, with their consent, of other events organised by the School that may be of interest to them.

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 or her personal data for one or more specific purposes (Art. 6 par. 1 lett. a of the GDPR).

## Type of data processed

The personal data used for the fulfillment of the purposes of this information subject to processing are: master data such as first and last name, email address, other contact data such as address, telephone, cell phone.

During the public ceremony, a photo and video shooting service will be activated in order to prepare multimedia material to be used as an educational, promotional and dissemination tool about the activities of the Institute, within the pursuit of the institutional purposes of the IUSS School in accordance with Article 6 letter e) of EU Regulation 2016/679.

Through adhering to the public ceremony and voluntarily going to the spaces in which a photographic and video filming service has been activated, the person concerned can reasonably expect to be, even if only incidentally, the subject of filming and authorizes IUSS to use, free of charge, his/her portrait and audio/video footage and recordings of his/her person, even in partial and/or modified or adapted form, made for the dissemination and communication activities of the IUSS Graduate School of Higher Education. This authorization implies the granting of a non-exclusive, unlimited, worldwide license, transferable to third parties, for the use of the materials and includes the rights under Articles 12 to 19 of Law April 22, 1941, no. 633, including but not limited to: the right of publication; the right of reproduction in any manner or form; the right of transcription, editing, adaptation, processing and reduction; the right of communication and distribution to the public, including the rights of projection, broadcasting and diffusion (purely by way of example on the IUSS Higher University School platforms (ex. IUSS institutional website and related sites, official social networks), including in summarized and/or reduced version, by any technical means; right to retain copies of the materials, including in electronic form and on any known or future invented technological support for the purposes and within the limits defined above.

In any case, any use of the portrait that could harm the honor, reputation or decorum of the person portrayed, filmed or recorded is excluded. Personal data will NOT be processed for commercial or marketing purposes or given to third parties.

#### Method of treatment

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

Disclosure 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 accordance with the relevant regulations, exclusively by the staff of this School, properly trained and authorized to process personal data, according to the functions arising from the organizational chart.

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

The data may also be communicated to external parties, identified as External Data Processors to whom the IUSS School entrusts services of its competence in outsourcing or with whom conventions or agreements are put in place.

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

#### **Data retention**

Personal data are kept according to the principle of necessity and for as long as is strictly necessary to achieve the purposes for which they are processed. The retention time of each data depends on the legal regulations and the retention periods of the documents containing these data. Data will be retained in accordance with the regulations on the retention of administrative records.

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

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.