



IUSS

Scuola Universitaria Superiore Pavia

INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR THE USE OF STUDY SUPPORT AND PERSONAL AUTONOMY SERVICES (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 the interested parties regarding the methods of data collection and processing for the use of study support and personal autonomy services offered by AIAS ETS Milano.

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).

External Data Processor

IUSS School has appointed AIAS ETS MILANO as Data Processor in accordance with Article 28 of the GDPR, with the task of carrying out the processing operations on personal data, which it comes into possession of or to which it has access in any case, necessary for the fulfillment of the obligations arising from the agreement and any ancillary services to it.

Purpose of processing and legal basis

Personal data are collected and processed for purposes related to the provision of specialized assistance and tutoring services to students with certified disabilities or specific learning disorders, identifying from time to time, based on the specific objectives and needs, the most appropriate intervention strategies. The purposes fall within the institutional tasks of the IUSS School.

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(1)(a) GDPR);
2. the processing is necessary to comply with a legal obligation to which the data controller is subject (Art. 6 (1)(c) GDPR);
3. the processing is necessary for the performance of a task carried out in the public interest or in connection with the exercise of official authority vested in the data controller (Art. 6(1)(e) GDPR).

The legal basis legitimizing the processing of health data is Article 9(2)(a) GDPR (*the data subject has given his or her explicit consent to the processing of such personal data for one or more specific purposes, except in cases where Union or Member State law provides that the data subject may not revoke the prohibition in paragraph 1*).



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Categories of data

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

- identifying data such as first and last name, address, social security number;
- Contact information such as cell phone number, email address;
- health-related data, defined by Article 4(1)(15) of the GDPR as "*data relating to the physical or mental health of a natural person, including the provision of health care services, that reveal information relating to his or her state of health.*"

The data subjects are candidates for the competition for the ordinary courses of the IUSS School and students already enrolled in the ordinary courses of the IUSS School.

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 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. 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."

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.

The data will also be processed by the appropriately trained staff of the Data Processor.

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 shall be kept in accordance with the principle of necessity and for as long as is strictly necessary to achieve the purposes for which they are processed. Data will be kept in accordance with the regulations on the preservation of administrative records.



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The data will be kept until the end of the data subject's academic career at the IUSS School.

Rights of the Interested Party

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

Data subjects, if the conditions are met, also have the right to lodge a complaint with the Guarantor in accordance with the procedures provided for in Article 77 of Regulation (EU) 2016/679, or to take action pursuant to Article 79 of the Regulation.

No automated processing will be carried out, including profiling as referred to in Article 22, paragraphs 1 and 4, of the GDPR.