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Scuola Universitaria Superiore Pavia

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF PERSONNEL LECTURER, ADMINISTRATIVE TECHNICIAN AND COLLABORATORS (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 staff (teaching, technical-administrative and collaborators) about the use of personal data provided at the time of the establishment of the employment relationship with the School, during the course of the same or at the time of its termination.

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).

Purpose of processing and legal basis

Personal data will be processed for the fulfilments required by law for the purposes of the establishment and management of the employment relationship, in accordance with the provisions of the relevant regulations in force, as well as national and supplementary collective labor agreements where applicable.

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

1. the processing is necessary for the performance of a contract to which the data subject is a party or for the performance of pre-contractual measures taken at the request of the data subject (Art. 6 par(1)(b) of the GDPR);
2. 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 processing of data relating to trade union membership is legitimized under Article 9(2)(b) of the GDPR ("*processing is necessary for the purposes of carrying out the obligations and exercising the specific rights of the data controller or the data subject in the field of labor law and social security and social protection, insofar as it is authorized by Union or Member State law or by a collective agreement under the law of the Member States, subject to appropriate safeguards for the fundamental rights and interests of the data subject*").

Categories of data

The personal data collected and processed are:

- a) identifying data, such as first and last name, date and place of birth, Social Security Number, residence, citizenship, ID;



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- b) contact information, such as email address or cell phone number;
- c) data on union membership;
- d) data related to criminal convictions and offenses (referred to in Article 10 of the GDPR) and other judicial data;
- e) The data provided by users from time to time in relation to the specific service requested.

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. 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."

The provision of data is, in general, mandatory. Failure to provide it precludes the establishment and continuation of the relationship with the IUSS School or otherwise the inability to access the services requested.

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 deriving from the organizational chart. The data may also be communicated to some external subjects, identified as External Data Processors (pursuant to Art. 28 of the GDPR) to whom the IUSS School entrusts services of its competence in outsourcing or with whom conventions or agreements are put in place. The data may therefore also be processed by the staff, adequately trained, of the Data Processor.

Personal data may be communicated in the cases provided for by Community provisions, laws or regulations, to the Judicial Authority to other public administrations in the national sphere with which the IUSS School has relations of exchange of information in order to fulfill its institutional tasks, as well as to all those public entities to which, in the presence of the relevant prerequisites, communication is mandatorily provided for (INPS, for disbursement and liquidation of pension treatment, INAIL, Ministry of Finance, competent health structures, for tax visits, Judicial Authority, MIUR, etc.).

Personal data will also be disclosed to the banking institution that, in agreement with the IUSS School, manages the procedure of collection/refund of university fees and contributions.



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Personal data may be transferred abroad (e.g., foreign universities, international organizations), including to countries outside the EU, for training periods abroad or for conducting research/teaching activities to other university institutions or research organizations or as part of international mobility projects.

Data retention

Personal data pertaining to employee records and career data will be retained indefinitely in accordance with archiving requirements imposed by current regulations.

Any other personal data that may be processed will be retained, depending on the type of documents, for no longer than is necessary to achieve the purposes for which they are processed ("principle of retention limitation": GDPR, art.5), in accordance with the provisions of the law.

The data will be kept in accordance with 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 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.