



# IUSS

Scuola Universitaria Superiore Pavia

## INFORMATION ON THE PROCESSING OF PERSONAL DATA OF THIRD PARTIES (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 third parties (including suppliers of goods and services, parties interested in participating in procedures for the selection of a contractor, providers of job placement and internship activities, external collaborators) about the use of personal data concerning them.

### 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 and legal basis for processing

The processing of personal data of individuals, acquired during contractual and pre-contractual operations (submission of the application for participation in the procedure for the choice of contractor, expression of interest in collaborating with the School IUSS, for the purpose of the conclusion of the contract or agreement, fulfillment of specific requests of the person concerned before the conclusion of the contract), is aimed at fulfilling the tasks entrusted to the IUSS School as an institution endowed with legal personality, the center of imputation of the legal effects of the negotiation activity that is exercised in the full capacity of public and private law and in compliance with and in support/integration of its institutional and statutory purposes. 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 (1)(b) 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).

### Categories of data

The personal data collected and processed are:

- a) identifying data, such as first and last name, date and place of birth, tax code, residence, citizenship, ID, VAT number;
- b) contact information, such as email address or cell phone number;
- c) data related to criminal convictions and offenses (referred to in Article 10 of the GDPR) and other judicial data;



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d) The data provided by users from time to time in relation to the specific service requested.

### **Treatment methods**

The collection of data is carried out in compliance with the principles of relevance, completeness and non excess 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 mandatory and failure to provide it precludes the establishment and continuation of the relationship with the IUSS School or otherwise the inability to access the requested procedures.

### **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. Data may therefore also be processed by the staff, adequately trained, of the External Data Processor.

The data may be communicated to the administrative authorities to which they must be transmitted according to the provisions of the law. Personal data will also be communicated to the banking institution that, in agreement with the IUSS School, manages the procedure of collection/reimbursement of expenses.

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

### **Data retention**

The determination of the period of retention of personal data meets the principle of necessity of processing. The retention periods for personal data generally depend on the laws and the retention periods of the documents containing them in accordance with the provisions also of the Civil Code for the retention of accounting records. The data will be kept in accordance with the regulations on the preservation of administrative records.



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## **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](mailto:diram@pec-iusspavia.it). The application may also be submitted through the Data Protection Officer, writing to [dpo@iusspavia.it](mailto: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.