

# INFORMATION ON THE PROCESSING OF PERSONAL DATA OF IUSS SCHOOL WEBSITE USERS

(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 School informs about the way its institutional website is managed with regard to the processing of personal data of the users who consult it. The School's website means all the pages that are located under the domain \*.iusspavia.it.

The validity of this policy is limited to the sites listed and not also for other third-party websites that may be consulted by the user through hypertext links referring to external resources. Specific disclosures supplementing this one may be made available on individual websites in cases where the context so requires.

# 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 <u>diram@pec-iusspavia.it</u>).

IUSS School has appointed a Data Protection Officer (headquarter 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>).

#### **External Data Processor**

The external Data Processor for the provision of the School's website services is the CINECA Consortium with registered office in via Magnanelli n. 6/3 - 40033 Casalecchio di Reno (BO).

## Purpose of processing and legal basis

The personal data processed during the consultation of the portal are aimed at enabling navigation and are processed by IUSS School in the performance of its tasks of public interest and related to institutional purposes (art. 6, paragraph 1, lett. e) of Regulation (EU) 2016/679), for institutional communication activities aimed at giving knowledge and visibility to institutional activities pursuant to Law no. 150/2000, to obtain anonymous statistical information on the use of the Official Portal of the School or related services, to fulfill legal obligations, to comply with orders from Public Authorities, to ascertain possible liability in case of hypothetical computer crimes against the site or its users.

The legal basis for the processing of cookies or other tracking tools is to be found in the consent referred to in Article 6(1)(a) of Regulation (EU) 2016/679.

Categories of data

Navigation data

The computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. These data are necessary for the use of web services.

This category of data includes the IP addresses or domain names of the computers used by users who connect to the site, the addresses in URI (Uniform Resource Identifier) notation of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment.

Once their function has ended, the data are automatically deleted (except for any need to ascertain crimes by the judicial authorities).

## Data provided voluntarily by the user

For the use of online services, which involve authentication and registration, personal data provided voluntarily by users are used.

The optional, explicit and voluntary sending of electronic mail to the addresses indicated on this site involves the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message. The personal data of students, acquired through matriculation and enrollment or any subsequent special methods of collection, will be processed for the performance of institutional activities, within the limits established by law and regulations, in accordance with the general principles of transparency, fairness and confidentiality.

The user is free to provide the personal data reported in the forms or forms on the IUSS School website; failure to provide them may make it impossible to obtain what has been requested. Specific information will be made available if the context requires it.

#### **Cookies**

Cookies are small text strings that a site sends to the user's browser (e.g. Internet Explorer, Mozilla Firefox or Google Chrome), which stores them and then transmits them back to the same site the next time the same user visits. The IUSS School websites use first-party technical cookies necessary for their operation, analytical cookies assimilated to technical cookies and third-party cookies. Cookies with explicit profiling purposes or for purposes other than those stated here are not used.

#### Technical cookies

These cookies are essential in order to allow you to move throughout the site and make full use of its features, such as accessing the various protected areas of the site. Without these cookies some services, such as browsing history, cannot be enjoyed.

The cookies sent by the portal are used exclusively for technical or similar reasons, such as storing temporary user preferences or improving the "user experience."

Since consent to their installation is not required, these cookies will always be used and sent to the browser in use, unless the user changes their settings. Disabling session cookies does not allow the use of online services.

## Analytical cookies

Analytical cookies are useful for measuring visits to the various pages of the Site as well as improving the performance and usability of the Site itself by processing aggregate data to create statistics. Disabling these cookies does not affect the navigation of the portal. IUSS uses Web Analytics Italia (Matomo) for the institutional site. The cookies used allow the collection and processing of browsing data through the Web Analytics Italia (WAI) platform released by the Agency for Digital Italy (AGID).

The data collected are: first part of the user's IP address (the entire IP address is not collected so as not to uniquely identify the person), date and time of the visit, method of sending the data, requested resource, response to the request, size in bytes of the response, source link of the user to the requested resource, operating system used, type of browser, type of device from which browsing (PC, smartphone, etc.), number of visits to a certain page, etc.).

## Optional third-party cookies

There are links to third-party sites on the site; these are cookies issued by third parties and the data, therefore, is collected by them and not by the operator of the site on which you are browsing. Information about processing and consent to use are the responsibility of the providers of those sites.

## **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 ensure their security and protect the utmost confidentiality of the data subject. 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."

#### **Social Media**

The University processes personal data conferred by users through the pages of dedicated Social Media platforms, as part of its institutional purposes, exclusively to manage interactions with users (comments, public posts, etc.) and in compliance with current regulations.

Communication, dissemination and transfer of data

Data processing related to the services of the portal of the IUSS School will be processed, in compliance with current legislation on the subject, exclusively by the staff (authorized to process personal data) of this School according to the functions deriving from the organizational chart or by the companies expressly appointed as data processors, who carry out their activities within the scope of the purposes provided for in their respective contracts and through identified and explicitly appointed staff. In such circumstances, data may be processed at the offices of service providers. Personal data may be communicated, in the cases provided for by provisions

Community provisions, laws or regulations.

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

#### **Data Retention**

Personal data are kept according to the principle of necessity and for the time strictly necessary to pursue 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. 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 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 - PECdiram@pec-iusspavia.it . The application may also be submitted through the Data Protection Officer, at . 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 processes, including profiling as referred to in Article 22(1) and (4) of the GDPR, will be adopted.

#### How to disable cookies

You can deny your consent for the use of cookies via the banner that appears when you first access the site.

You can change your cookie preferences at any time by clicking on the "Cookie settings" link in the portal footer.

You can also revoke your consent to the use of cookies by selecting the appropriate setting on your browser. Please note, however, that should you revoke your consent to the use of all cookies, you will not be able to take advantage of services that require authentication.

Links are provided below that also explain how to disable cookies for the most popular browsers (for other browsers you may use, we suggest looking for this option in the software help.

Internet Explorer https://support.microsoft.com/en-us/windows/delete-and-manage-

cookies- 168dab11- 0753-043d-7c16-ede5947fc64d#ie=ie-10

**Google Chrome** https://support.google.com/chrome/answer/95647?hl=it

Mozilla Firefox https://support.mozilla.org/it/kb/Gestione%20dei%20cookie?redirect

locale=e n- US&redirectslug=Cookies

**Opera** https://help.opera.com/en/latest/web-preferences/#cookies

**Apple Safari** https://www.apple.com/legal/privacy/it/cookies/

# To delete cookies already stored on the terminal

Even if permission to use third-party cookies is revoked, prior to that revocation cookies may have been stored on the user's terminal. The user's browser allows their deletion among the privacy settings. Browser options contain a "Clear browsing data" option that can be used to delete cookies, site data and plug-ins.

## Check your behavioral or profiling cookies

You can take a look at the profiling/behavioral cookies on your browser for activity tracking by visiting https://www.youronlinechoices.com/it/le-tue-scelte.