



IUSS

Scuola Universitaria Superiore Pavia

INFORMATION ON THE PROCESSING OF PERSONAL DATA in connection with the negotiation and execution of the contractual relationships (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 provides information to the data subjects on the processing of personal data carried out in connection with the negotiation, execution and management of the contractual relationship being established. This information is addressed to the Counterparty (if a natural person) and to the subjects referred to 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).

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).

Purposes of processing and legal basis

Personal data are collected for purposes related and/or connected to the establishment and management of the contractual relationship between the parties.

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

1. necessity of the processing for the purpose of entering into and executing the contract, including in the pre-contractual phase (Art. 6 par. 1 letter b of the GDPR);
2. necessity of processing for the purpose of fulfilling legal obligations to which the Data Controller is subject (Art. 6 par. 1 lett. c of the GDPR);
3. necessity of the processing for the performance of a task of public interest or in connection with the exercise of public authority vested in the Data Controller (Art. 6 par. 1 lett. e of the GDPR).

It should be noted that refusal to communicate the requested data prevents the conclusion of this agreement.

Categories of data

Subject of the processing are the Personal Data provided by the Counterparty at the time of the establishment and in the continuation of the contractual relationship with the Company, such as personal data, place of birth, residence, tax code and/or VAT number, telephone number/email address.

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



IUSS

Scuola Universitaria Superiore Pavia

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."

Communication, dissemination and transfer of data

Personal data will be processed, in compliance with the relevant regulations in force, exclusively by the personnel (authorized to process personal data) of this School according to the functions arising from the organizational chart.

The data may be communicated:

- I. to the Bank that acts as treasurer of the Scuola Universitaria Superiore IUSS of Pavia;
- II. to the authorities in charge of fiscal and administrative inspection and verification activities;
- III. to the judicial authority in the cases provided for by law;
- IV. to any other public entity to which Union law or national regulations require communication.

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

Data Retention

Personal data are kept in accordance with the principle of necessity and for the time strictly necessary to pursue the purposes for which they are processed. Data will be retained in accordance with the regulations on the retention 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 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 diram@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.



IUSS

Scuola Universitaria Superiore Pavia

No automated process, including profiling as referred to in Article 22(1) and (4) of the GDPR, will be adopted.