

**INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR THE USE OF THE PORTAL
PAYMENTS PLATFORM "PagoPA" FOR PAYMENTS TO THE ADMINISTRATION
(pursuant to EU Regulation 2016/679)**

Pursuant to Article 13 of the EU Regulation 2016/679 ("GDPR") on the protection of persons with regard to the processing of personal data and on the free movement of such data, IUSS School informs those who interact with the PagoPA payments portal on how to manage personal data. The portal can be reached at www.iusspavia.pagoatenei.cineca.it, corresponding to the service's home page.

The IUSS School, as required by the regulations, adheres to PagoPA, the electronic payments system created to make payments to the Public Administration simpler, safer and more transparent. The PagoPA system is managed by PagoPA S.p.A., the autonomous data controller of the personal data of those who use the digital platform to make a payment.

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).

The Internal Data Processor of the PagoPA payment portal is the Director General of the IUSS School.

Purposes of processing and legal basis

Personal data are collected for the purpose of making payments due to the IUSS School through access to the Italian Public Administration payment system PagoPA. The data may be processed for purposes that are obligatory by law such as the fulfillment of obligations arising from adherence to the pagoPA system, to respond to any requests from the Judicial Authority and the Judicial Police, in relation to investigative activities and for the detection of computer crimes. Browsing data is used in order to control the proper functioning of the service and to support security.

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

1. necessity of processing for the purpose of entering into and executing a 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 related to the exercise of public powers vested in the Data Controller (Art. 6 par. 1 lett. e of the GDPR), Legislative Decree No. 82/2005 "Digital Administration Code," Decree-Law No. 179/2012.



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Categories of data

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

- a) personal data, such as first and last name or name, tax code or vat number;
- b) personal and contact data address, e-mail address, telephone, cell phone;
- c) data related to the transaction for the payment to be made to the University (transaction_ID, outcome, notice number, amount, due date, reason for payment, date of payment);
- d) navigation data: computer systems and software procedures related to platform operation acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected in order to be associated with identified interested parties, but by its very nature could, through processing and association, allow users to be identified. This category of data includes the IP addresses or domain names of the computers used by the users who connect to the service, the URI notation addresses of the requested resources, the time of the request, the method used in submitting 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.

The provision of the data referred to in points a), c) and d) is mandatory in order to access the service and complete the payment procedure. The data referred to in b) may be disclosed by the data subject on a voluntary basis and are not necessary for the performance of the service, but may be useful for the proper management of the administrative file related to the payment.

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, mainly 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 may possibly also be processed by means of paper support. 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".

Refusal to communicate the requested data prevents the data subject from accessing the service.



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Communication, dissemination and transfer of data

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

Personal data will also be processed by PagoPA S.p.A., which, however, acts as the Autonomous Data Controller.

The data may be communicated:

- I. to the Bank acting as Treasurer of the IUSS University School of Pavia;
- II. to the authorities in charge of fiscal and administrative inspections and audits;
- 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 retained in accordance with the principle of necessity and for the time strictly necessary to achieve 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 – 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.

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