

**INFORMATIONS ON THE PROCESSING OF PERSONAL DATA OF IUSS SCHOOL USERS
(prospective students/students, freshmen and those enrolled
to all pre and postgraduate courses, graduates/undergraduates)
(Pursuant to EU Regulation 2016/679)**

Pursuant to 13 of EU Regulation 2016/679 ("RGPD") relating to the protection of individuals with regard to the processing of personal data and on the free movement of such data, IUSS School informs users (aspiring students/students, freshmen and those enrolled in all pre- and post-graduate courses, graduates/undergraduates) about the use of personal data concerning them provided at the time of enrollment, acquired during the course of training or formed by the IUSS School in the management of the university career. The processing of such data is essential to fulfill the tasks entrusted to the IUSS School and for the provision of educational and auxiliary services to users.

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

The processing of personal data requested from the data subject is carried out in accordance with Art. 6 (e), Art. 9, 10 of Regulation (EU) 2016/679, for the performance of tasks of public interest or otherwise related to the exercise of its public powers, including the fulfilments required by law for the purposes of the management of the educational and administrative relationship between the IUSS School and students as well as for the provision of specific services requested by users. Data may also be processed for historical, statistical or scientific purposes, including archiving, historical/scientific research and analysis for statistical purposes, in compliance with legal regulations and codes of ethics. The IUSS School, in a form that does not allow the direct identification of the data subject, may carry out research activities aimed at analyzing possible improvements in services.

Categories of data

The personal data collected and processed are:

- 1) those provided directly by users at the time of application online and enrolling in pre- and postgraduate courses;
- 2) tax and salary data entered online at the time of matriculation or enrollment in subsequent years, or provided for requirements related to the payment of university fees;



IUSS

Scuola Universitaria Superiore Pavia

- 3) data provided from time to time by users in relation to the specific service requested;
- 4) data related to the university career.

Treatment methods

Data collection is carried out in accordance 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 accordance with the principles of lawfulness, fairness and transparency, as set out in Article 5 of the GDPR, with the aid of IT and telematic tools designed to store and manage the data and, in any case, in such a way as to guarantee their security and protect the maximum confidentiality of the data subject. The data may also be processed on paper. 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 unauthorised 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 the data precludes the establishment and continuation of the relationship with the IUSS School. Failure to provide the data will also result in the inability to access the requested services.

Communication, dissemination and transfer of data

Personal data will be processed, in compliance with current legislation, exclusively by the staff of IUSS School, who are adequately trained and authorised to process personal data, based on the functions assigned to them in the organisational chart.

Data given to the IUSS School may be communicated to other public entities, with the exclusion of public economic entities, with which the IUSS School has information exchange relationships in order to fulfill its institutional tasks. In particular, they may be communicated:

- to the M.U.R. for inclusion in the National Student Registry (established by Law No. 170 of 2003) to monitor the career progress of all university students;
- to the Ministry of Finance;
- to local authorities, for the purpose of any subsidies for particular categories of students;
- State Attorney's Office, Ministry of Foreign Affairs, Police Headquarters, Embassies, Public Prosecutor's Office with regard to residence permits, recognition of particular statuses;
- Region, other accredited or authorized public and private operators and potential employers for the purpose of orientation and insertion into the world of work (in accordance with Law No. 30 of 2003, on the reform of the labor market and subsequent implementations) of students/students and graduates/undergraduates of the IUSS School who request it;
- Insurance entities for accident practices;



IUSS

Scuola Universitaria Superiore Pavia

- Regional Management Bodies (Bodies established pursuant to Law No. 390 of 1991 on the right to university studies) EDiSU and other institutions to promote international mobility of students/students, for the purpose of evaluating economic benefits and housing allocation (Law No. 390 of 1991 and relevant Regional Laws) and other entities as part of participation in international programs.
- Judicial Authority.

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

These data may be communicated to subjects and entities engaged in studies or activities having historical, statistical or scientific purposes, always in compliance with Regulation (EU) 2016/679.

The data may also be communicated to some external parties, identified as External Data Processors to whom the IUSS School entrusts services of its competence in outsourcing or with whom conventions or agreements are put in place. The data collected will not be transferred to non-EU countries except in special cases such as exams taken abroad (non-EU) upon specific information.

Data retention

All personal data relating to students' careers are stored indefinitely. In particular, pursuant to Article 6, paragraph 1, letter e) of the GDPR, the processing of such data is lawful insofar as it is necessary for the performance of tasks carried out in the public interest in the exercise of institutional functions of the Universities. Pursuant to Article 5, paragraph 1, letter e) of the same Regulation, the aforementioned data may also be stored indefinitely for archiving purposes in the public interest, in accordance with the provisions of Article 44 of Legislative Decree no. 82 of 7 March 2005 (Digital Administration Code), as well as the guidelines issued by the Agency for Digital Italy (AgID) and the provisions of university regulations. The permanent storage of data and documents relating to academic qualifications is necessary to ensure legal certainty, authentication, reproducibility and verifiability over time of documents of legal, administrative and historical significance.

Any other personal data processed will be stored, depending on the type of document, for a period of time not exceeding that necessary to achieve the purposes for which they are processed ('principle of storage limitation': GDPR, Art. 5), in accordance with the provisions of the law. Data will be kept in accordance with the regulations on the preservation of administrative records.

Rights of the data subject



IUSS

Scuola Universitaria Superiore Pavia

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.