



## INFORMATION ON THE PROCESSING OF PERSONAL DATA (Pursuant to EU Regulation 2016/679)

### 1. Introduction

Pursuant to Article 13 of Regulation (EU) 2016/679 ("GDPR") and Italian Legislative Decree no. 196/2003, as amended, the the IUSS School (hereinafter also "IUSS" or the "Data Controller") provides participants in seminars, workshops and training events requiring prior registration, organised within the initiative **EFC – Educating Future Citizens** and funded through dedicated project funds, with information on the processing of personal data collected during registration and in the course of the organization and management of the related activities.

### 2. Data Controller and Data Protection Officer (DPO)

#### Data Controller

Scuola Universitaria Superiore IUSS di Pavia, represented by the Rector,  
registered office: Piazza della Vittoria no. 15, 27100 Pavia (Italy)

Certified email (PEC): [diram@pec-iusspavia.it](mailto:diram@pec-iusspavia.it)

#### Data Protection Officer (DPO)

Piazza della Vittoria no. 15, 27100 Pavia (Italy)

Tel.: +39 0382 375876

E-mail: [dpo@iusspavia.it](mailto:dpo@iusspavia.it)

PEC: [diram@pec-iusspavia.it](mailto:diram@pec-iusspavia.it)

### 3. Categories of recipients of the data

Personal data may be accessed and processed, in compliance with applicable data protection legislation, by authorised staff members and collaborators of the relevant University offices, duly instructed by the Data Controller, as well as by external service providers expressly appointed as **Data Processors** pursuant to Article 28 GDPR, to whom IUSS outsources certain technical and administrative services.

Personal data may also be disclosed where required by EU law, national legislation or regulations.

Event registration is carried out through **Google Forms**. The service provider has been duly appointed as a Data Processor pursuant to Article 28 GDPR by means of a specific agreement, under which it undertakes to process personal data on behalf of the Data Controller and to implement appropriate security measures.

Where the service entails transfers of personal data to third countries, such transfers are carried out in compliance with Articles 44 et seq. GDPR, on the basis of appropriate safeguards and contractual clauses provided for in the relevant agreement.

### 4. Purposes of the processing

Personal data are processed for the following purposes:



- a) organisational, administrative and logistical management of EFC training events (including participant registration, operational communications, attendance management, issuance of certificates and access management);
- b) fulfilment of legal and project-related obligations connected with EFC funding (reporting, monitoring, record keeping and communications to competent authorities);
- c) management of reimbursements, travel and accommodation, where applicable, including the disclosure of data to authorised third parties;
- d) monitoring and evaluation of the project, including the collection and processing of aggregated data relating to participants' gender and age groups;
- e) institutional documentation and communication of project activities, including through photographs and videos, within the limits set out in Section 7;
- f) sending communications regarding future events of similar nature organised by IUSS, subject to the data subject's prior consent.

## 5. Legal basis for the processing

The processing of personal data is lawful as it is based on:

- **Article 6(1)(e) GDPR:** performance of a task carried out in the public interest, connected with IUSS's institutional activities and the management of publicly funded training projects (purposes a–e, limited to contextual images);
- **Article 6(1)(c) GDPR:** compliance with legal and reporting obligations (purpose b);
- **Article 6(1)(a) GDPR:** the data subject's consent, exclusively for optional purposes (purpose f and individual or identifiable recordings referred to in Section 7).

Failure to provide consent for optional purposes does not affect participation in the events.

## 6. Categories of personal data processed

IUSS processes the following categories of personal data:

### Data collected during registration:

- first name and surname;
- date of birth;
- age group (0–17; 18–29; 30–54; 55 and over);
- gender (women, men, other);
- e-mail address and telephone number.

**Additional data**, processed only where necessary and relevant for project or administrative purposes:

- identity document;
- residential address;
- bank details (IBAN) and tax data, where required for reimbursements or payments.

IUSS processes exclusively personal data that are strictly necessary for the purposes pursued, in accordance with the data minimisation principle set out in Article 5(1)(c) GDPR.



Data relating to gender and age groups are also processed in aggregated form for EFC project monitoring purposes.

## 7. Images and videos during events

EFC events are training activities requiring prior registration and are not open to the general public.

### 7.1 Contextual recordings

During the events, photographic and audiovisual recordings may be made for documentation purposes, without individual focus and used for institutional communication related to the project.

### 7.2 Individual or identifiable recordings

Any individual recordings, interviews or identifiable testimonials will be carried out exclusively on a voluntary basis, subject to the data subject's explicit consent and the signing of a specific release form.

### 7.3 Notice

An appropriate notice informing participants of the possible recording of images and videos will be displayed during the events.

## 8. Disclosure of data to third parties

Personal data may be disclosed, where strictly necessary, to the following categories of recipients:

- the Italian Revenue Agency (Agenzia delle Entrate) and other competent public authorities;
- travel agencies, accommodation providers and transport companies for logistical arrangements;
- suppliers and consultants appointed as Data Processors pursuant to Article 28 GDPR.

Personal data are not subject to unrestricted dissemination.

## 9. Data retention

Personal data are retained for the period strictly necessary to fulfil the purposes indicated above and in accordance with the retention periods provided for by applicable legislation governing the reporting of funded projects.

Personal data processed on the basis of consent are retained until such consent is withdrawn, unless a longer retention period is required by law.

## 10. Data subject's rights

Data subjects may exercise the rights provided for in Articles 15 et seq. GDPR by contacting the Data Controller or the DPO using the contact details indicated above. Data subjects also have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali).



## 11. Automated decision-making

No automated decision-making processes, including profiling, are carried out pursuant to Article 22 GDPR.

### Acknowledgement of receipt of the Privacy Notice

By selecting the relevant checkbox during registration, the user confirms that they have read this Privacy Notice.

Such acknowledgement does not constitute consent, which is required exclusively for optional processing purposes.

*I declare that I have read and understood the Privacy Notice on the processing of personal data pursuant to Article 13 of Regulation (EU) 2016/679 (GDPR). In the case of a minor participant, the Privacy Notice has been brought to the attention of the parents/legal guardians.*

### Optional consent – future communications

*I consent*  *I do not consent* to receiving communications regarding future events organised by IUSS.

Consent is optional and may be withdrawn at any time.