



IUSS

Scuola Universitaria Superiore Pavia

INFORMATION ON THE PROCESSING OF PERSONAL DATA

(pursuant to Article 13 of Regulation (EU) 2016/679 – “GDPR”)

1. Introduction

Pursuant to Article 13 of Regulation (EU) 2016/679 (“GDPR”) and Legislative Decree No. 196/2003, as amended, the **Scuola Universitaria Superiore IUSS di Pavia** (hereinafter also referred to as “IUSS” or the “Data Controller”) informs participants in workshops, seminars and training events funded by the EFC – Educating Future Citizens network about the methods used to process personal data collected during registration and in connection with the organisation and management of the related activities.

The data subjects concerned by the processing (“data subjects”) include participants in training events, students, academic and administrative staff involved in the activities, as well as speakers, collaborators and other individuals taking part in initiatives organised within the framework of the project.

2. Data Controller and Data Protection Officer (DPO)

Data Controller

Scuola Universitaria Superiore IUSS of Pavia, represented by the Rector, Piazza della Vittoria n. 15, 27100 Pavia – PEC: diram@pec-iusspavia.it.

Data Protection Officer (DPO)

Piazza della Vittoria n. 15, 27100 Pavia – Tel. 0382 375862 – e-mail: dpo@iusspavia.it – PEC: diram@pec-iusspavia.it.

3. Categories of recipients of personal data

Personal data may be processed, in compliance with applicable data protection legislation, by authorised personnel and collaborators of the competent offices of the University who have been duly instructed by the Data Controller.

Personal data may also be processed by external service providers formally appointed as Data Processors pursuant to Article 28 GDPR, to whom the University entrusts certain technical and administrative services on an outsourced basis. Personal data may be disclosed where required by European Union law, national legislation or applicable regulations.

With regard to the specific processing operations related to the infrastructure and technical management of the digital platform used for event registration and management, please refer to the technical privacy notice available at:

<https://www.gomry.com/docs/privacypolicy>

Where the service involves transfers of personal data to third countries, such transfers will take place in compliance with Articles 44 et seq. of the GDPR, based on appropriate safeguards.

4. Purposes of the processing

Personal data are processed for the following purposes:

- a) organisational, administrative and logistical management of training events (participant registration, operational communications, attendance management, issuance of certificates, access management);
- b) compliance with legal and project-related obligations connected with the **EFC funding programme** (reporting, monitoring, document retention, communications to competent authorities);
- c) management of reimbursements, travel arrangements and accommodation, where applicable, including communication of personal data to third-party service providers where necessary;
- d) monitoring and evaluation of the project, including the collection of aggregated data relating to participants’ gender and age groups;
- e) documentation and institutional communication of the project activities, including photographs and video recordings, within the limits indicated in Section 7;
- f) sending communications regarding future events organised by IUSS that are similar in nature, subject to the data subject’s consent.



5. Legal basis for the processing

The processing of personal data is lawful as it is based on the following legal grounds:

- **Article 6(1)(e) GDPR** – processing necessary for the performance of a task carried out in the public interest in connection with the institutional activities of IUSS and the management of publicly funded training projects (purposes a–e, limited to contextual event recordings);
- **Article 6(1)(c) GDPR** – compliance with legal obligations and project reporting requirements (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 will not affect participation in the event.

6. Categories of personal data processed

IUSS processes the following categories of personal data in accordance with the principles of lawfulness, data minimisation and proportionality set out in Article 5 GDPR.

Data provided by the data subject during registration

- first and last name
- date of birth
- email address
- telephone number

Additional data processed for organisational or administrative purposes (where necessary)

- affiliation, role or professional position
- residence or domicile address
- identity document, where required for organisational or security purposes
- tax information and bank details (IBAN), exclusively where necessary for the payment of reimbursements, compensation or services related to participation in the events

Data related to participation in events

- event/workshop/seminar registration data
- attendance tracking and issuance of participation certificates
- logistical information necessary for event organisation (e.g. travel, accommodation or catering requirements, where provided for within the project)

Technical data related to the use of the digital platform

- IP address
- authentication data and login credentials
- access logs and platform usage timestamps
- technical data necessary to ensure system security, prevent unauthorised access and guarantee the proper functioning of the service.

Content voluntarily provided by the data subject

- any information included in registration forms, communications relating to the organisation of the events or interactions with the platform.



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No systematic processing of special categories of personal data pursuant to Article 9 GDPR is envisaged. Should such data be voluntarily provided by the data subject, they will be processed exclusively within the limits of the purposes indicated and in compliance with the safeguards provided by applicable legislation.

7. Photographs and video recordings during event

EFC events are registration-based training events and are not open to the general public

7.1 Documentation recordings

During the events, photographs and video recordings may be taken for documentation purposes, without individual focus, for the institutional communication activities of the project.

7.2 Individual or identifiable recordings

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

7.3 Notice

During the events, appropriate notices will be displayed informing participants of the possible presence of audiovisual recordings.

8. Disclosure of personal data to third parties

Personal data may be disclosed, where necessary, to:

- authorised personnel of IUSS
- travel agencies, accommodation providers and transport companies for logistical organisation
- IT and cloud service providers
- suppliers and consultants appointed as Data Processors pursuant to Article 28 GDPR.

Personal data are not subject to indiscriminate dissemination.

Personal data may be stored on servers located within the European Union. Any transfers to third countries will take place in compliance with Articles 44–49 GDPR and subject to appropriate safeguards.

9. Data retention

Personal data will be retained for the time necessary to achieve the purposes described above and for the periods required by legislation governing the reporting and management of funded projects.

Data processed on the basis of consent will be retained until such consent is withdrawn, unless legal obligations require longer retention.

10. Rights of the data subject

Data subjects may exercise their rights under Articles 15 et seq. of the GDPR by contacting the Data Controller or the Data Protection Officer at the contact details provided 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 pursuant to Article 22 GDPR, are carried out.

Acknowledgment of the Information on the processing of personal data

Ticking the relevant box during the registration process confirms acknowledgment of this Privacy Notice pursuant to Article 13 GDPR.

Providing the data marked as mandatory is necessary for registration and participation in the event. Failure to provide such data will make it impossible to complete the registration process.



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Acknowledging this information does not constitute consent. Consent is required exclusively for the optional purposes indicated in this information (e.g. communications regarding future events and identifiable individual recordings) and may be freely given and withdrawn at any time.

Acknowledgment

I confirm that I have read the Information of the processing of personal data (Article 13 GDPR).

Communications regarding future events (optional)

I consent to receive communications from IUSS regarding similar future events.

I do not consent to receive communications from IUSS regarding similar future events.

Legal basis: Article 6(1)(a) GDPR – consent, freely given and withdrawable at any time)

Individual identifiable recordings (optional)

I consent to the taking and use of photographs and video recordings in which I am recognisable for the institutional communication purposes of the project, as described in the Information of the processing of personal data.

I do not consent to the taking and use of photographs and video recordings in which I am recognisable.

(Legal basis: Article 6(1)(a) GDPR – consent, freely given and withdrawable at any time)