



IUSS

Scuola Universitaria Superiore Pavia

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

Pursuant to Article 13 of the EU Regulation 2016/679 ("GDPR") on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, the IUSS School informs data subjects regarding the collection of data for participation in organized events and ceremonies.

Data controller and data protection officer (DPO)

The Data Controller is the IUSS Pavia School for Advanced Studies, represented by the Rector (registered office: Piazza della Vittoria n. 15, 27100 Pavia – PEC: diram@pec-iusspavia.it).

IUSS University School of Higher Education has appointed the Data Protection Officer (registered office: Piazza della Vittoria n. 15, 27100 Pavia – Tel. +39 0382 375862 – email: dpo@iusspavia.it – PEC: diram@pec-iusspavia.it).

The internal Data Processor is the General Director of the IUSS School, Eng. Giuseppe Conti.

External Data Processor

Event registrations are generally collected using Google Forms. Google acts as an external data processor pursuant to Article 28 GDPR.

Purpose and legal basis for processing

Personal data will be processed for the following purposes:

- **Purpose 1:** registration for participation in the event
- **Purpose 2:** sending communications about future events and initiatives
- **Purpose 3:** reporting food intolerances or allergies
- **Purpose 4:** statistical analysis on aggregated data

For Purposes **1 and 2**, the data processed include: personal identification data, contact details, photos, and audio/video recordings.

For Purpose **3**, in events involving catering services, special categories of data (health data) may be processed to report food intolerances or allergies.

Legal basis:

- **Purpose 1:** public interest (Art. 6(1)(e)) or consent (Art. 6(1)(a))
- **Purpose 2:** optional consent (Art. 6(1)(a))
- **Purpose 3:** consent (Art. 6(1)(a))

Consent may be given by completing a registration form or by voluntarily attending the event.



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Providing data for **Purpose 1 is mandatory**. Refusal prevents participation. Providing data for **Purposes 2 and 3 is optional**, but refusal prevents receiving communications or accessing catering services.

Participants may be subject to audio/video recordings during events. Such materials (including images and recordings, even partially edited) will be processed in full compliance with GDPR.

Type of data processed

Processed data include:

- personal identification data (name, surname),
- email address and contact details (address, phone, mobile),
- photographic and video recordings for institutional communication purposes (Art. 6(1)(e) GDPR).

Participation in events held in recorded areas implies possible image capture and constitutes free authorization for the School to use such images for institutional communication purposes.

The granted license is:

- non-exclusive,
- unlimited in time and territory,
- transferable to third parties,
- including rights of publication, reproduction, editing, distribution, and archiving (Italian Law 633/1941).

Any use that may harm the dignity, honor, or reputation of the data subject is excluded.

Personal data will **not** be used for commercial or marketing purposes, nor transferred to third parties.

Method of treatment

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, 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. 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."

Disclosure of data is not mandatory. However, 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 accordance with the relevant regulations, exclusively by the staff of this School, properly trained and authorized to process personal data, according to the functions arising from the organizational chart.

Data may be disclosed to administrative authorities to which they must be transmitted according to legal requirements.

The data may also be communicated to 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.

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

Data retention

Personal data are kept according to the principle of necessity and for as long as is 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. Data will be retained in accordance with the regulations on the retention of administrative records.

Rights of the Interested Party

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 is taking place 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 in accordance with Article 79 of the GDPR.

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