



## **POLICY ON PERSONAL DATA PROCESSING** **[Art.13 of EU Regulation 2016/679 - General Data Protection regulation]**

This policy is provided pursuant to art. 13 of EU Regulation 2016/679 (General Regulation on Data Protection, "EU Regulation"), in relation to personal data of which the University of Padua (the "University"), in its capacity as Data Controller, acquires during registration, pre-enrolment, matriculation or enrolment, to manage the career of the data subjects concerned (students, graduates and those enrolled in any course or training activity provided by the University) and any other service and further fulfilment that may be necessary as a result of such relationship.

Personal data is processed fairly, lawfully and transparently, as well as in a manner that safeguards the privacy and rights of all data subjects, as per what specified below.

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### **1. Data controller**

The Data Controller is the University of Padua with registered office in Via VIII Febbraio no. 2, 35122 - Padova (certified email address: [amministrazione.centrale@pec.unipd.it](mailto:amministrazione.centrale@pec.unipd.it)).

### **2. Data-protection officer**

The Data Controller has its own Data-protection officer, who is appointed pursuant to Article 37 of the EU Regulation. The Data-protection officer may be contacted at: [privacy@unipd.it](mailto:privacy@unipd.it)

### **3. Sources and types of data**

The University will process the personal data provided by the data subject during registration, pre-enrolment, matriculation and enrolment in the degree courses, doctorate, specialization courses, master's degree and any other advanced training or professional course offered by the University, even after achieving their final qualification.

The personal data that may be processed exclusively for the purposes stated in point 4 are:

- a) personal data (name, surname, date of birth, gender), contact details, residence, career, qualifications held and income conditions;
- b) specific data (e.g. data relating to health, racial and ethnic origin and sexual orientation) which is processed only if expressly authorized by law, to pursue relevant public interest objectives, or with the consent of the data subject expressed at the same time as the needs arise (such as, for example, an accident);
- c) data on criminal convictions and offences.

#### **4. Purposes for data processing**

Data is processed exclusively for carrying out all the activities related to the institutional and public interest activities of the University. In particular, data is processed for the following purposes:

##### *I. Purposes related to managing the university career and legal and economic relationships*

- a) managing admission procedures for courses with limited places and post-graduate courses;
- b) pre-enrolment and matriculation to be admitted to degree courses and enrolment in training activities;
- c) managing university career, including achieving the qualification and any other final certificate;
- d) communications on administrative paperwork;
- e) calculation of the amounts of the fees due and, in general, of economic benefits (e.g. bonuses, scholarships, so-called former 150-hour students);
- f) managing the inclusion service in the student community of students with specific disabilities, SLD and BES;
- g) international mobility;
- h) possible participation in research projects or other activities compatible with the University's institutional aims;
- i) managing the procedures connected with the election of student representatives and for the possible performance of the tasks related to the elective office held by the data subject in University bodies;
- j) managing disciplinary proceedings against students;
- k) using the information, IT and e-mail services provided by the University;
- l) managing teaching, exams and final assessments to achieve the qualification and any other final certificate;
- m) use of library services;
- n) access to laboratories and other restricted facilities;
- o) activating and managing curricular and extracurricular internships, also with affiliated bodies;
- p) video-surveillance of University facilities;
- q) managing claims;
- r) checking the truthfulness of the self-certifications made pursuant to Presidential Decree no. 445/2000;
- s) statistical surveys carried out within the University in order to improve services and assistance to students or to improve the teaching activity;

t) storage in the public interest, research for scientific, historical or statistical purposes.

*II. Other institutional purposes*

- a) dissemination of the educational offer and of the informative and cultural events organized or sponsored by the University or by the teaching and research bodies;
- b) incoming orientation, tutoring and outgoing student orientation, activities aimed at job placement, also through communicating data to private and public entities and inter-university consortia for exclusive employment or professional purposes.

*III. Purposes requiring consent*

- a) publication of the degree data in the University's thesis catalogue;
- b) communicating, activating and managing initiatives aimed at giving scholarships, awards, honors and events of public interest, including by means of communication of data to private and public entities and inter-university consortia;
- c) dissemination of information using paper or electronic means for possible employment opportunities.

## **5. How data is processed**

The personal data of the data subject is processed by IT and paper means.

The University takes appropriate organizational and technical measures to protect the personal data in its possession, through appropriate security measures to ensure the confidentiality and security of personal data, in particular against loss, theft, and unauthorized use, disclosure or modification of personal data.

The Data Controller does not resort to automated decision-making processes relating to the rights of the data subject on the basis of personal data, including profiling, in compliance with the safeguards provided for in art. 22 of the EU Regulation.

Any processing of the particular data referred to in point 3), letter b), will also be carried out in compliance with the "Regulations for the processing of sensitive and judicial data of the University", which are available at <https://www.unipd.it/regolamenti-interesse-generale>.

The personal email address, the telephone contact details the data subject may have provided and the institutional email address assigned at the time of registration or enrolment are the means by which all communications and information related to career management and the pursuit of all the purposes mentioned in point 4 will be sent.

## **6. Legal basis of the processing and type of provision**

The processing of personal data for the purposes stated in point 4 is carried out by the Data Controller on the basis of at least one of the following conditions of lawfulness:

Personal and common personal data (point 3, letter a) are processed for the performance of tasks of public interest as defined by law, by the Statute and by internal regulations (pursuant to art. 6, par. 1 of the EU Regulation).

Consent is the legal basis for processing the data provided for the purposes set out in Section III of point 4 ('Purposes requiring consent') and for processing particular personal data (such as those relating to health, political opinions or religious beliefs, etc.) and judicial data (point 3, letters b and c), when one of the following legal bases is not present:

- a) for reasons of relevant public interest on the basis of European Union or national law pursuant to Article 9, paragraph 2, letter g of the EU Regulation and Article 2-sexies, par. 2, letters bb of Legislative Decree no. 196/2003;

- b) for storage purposes in the public interest, scientific or historical research or for statistical purposes pursuant to Article 9, paragraph 2, letter j) of the EU Regulation and Article 2-sexies, paragraph 2, letter cc) of Legislative Decree no. 196/2003;
- c) to ascertain, exercise or defend a right in court;

The provision of personal data for the purposes stated in section I of point 4 ("I. Purposes related to the management of the legal relationship with the University") is essential to establish and manage the relationship between the data subject and the University, for the provision of services and for the fulfilment of the related legal obligations.

The data subject may request their personal data to be processed in limited form also with reference to the purposes stated in Section II of point 4 ("II. Other institutional purposes").

## **7. Data recipients**

Data recipients are the natural persons appointed by the University to process the data, including employees and collaborators, including self-employed ones, of the University of Padova and affiliated bodies.

Data recipients include also the Data Processors appointed by the Data Controller, including CINECA Consorzio Interuniversitario, as IT service provider, with registered office in via Magnanelli 6/3 - 40033 Casalecchio di Reno (BO).

Solely for the purposes listed in point 4, personal data may be disclosed to third parties, including:

- a) ESU di Padova - Azienda regionale per il diritto allo studio universitario;
- b) Regional Management Bodies (Authorities with administrative-management autonomy set up pursuant to Law 390/91 on the right to university studies) and other institutions to promote international student mobility for the purposes of assessing economic benefits and housing allocation (Law 390/1991 and Regional Law no. 37 of 14.09.87);
- c) MIUR for the inclusion in the National Register of Students (established by Law no. 170/2003) to monitor the career development of university students and to carry out all the functions provided for by law;
- d) Pro-tempore treasurer institute of the University of Padova and other joint-stock banks for the fulfilment of monetary obligations, in particular for the payment and reimbursement of university fees;
- e) public authorities, including international ones, for the performance of the institutional functions of the University requested by the data subject;
- f) the Region, other accredited or authorised public and private operators and potential employers for guidance and job placement purposes;
- g) affiliated bodies where the data subjects carry out traineeships or internships;
- h) insurance companies affiliated with the University;
- i) Ministry of Foreign Affairs, Police Headquarters, Embassies, Public Prosecutor's Office for residence permits and recognition of special status;
- j) private, public and inter-university consortia for the performance of third mission activities.

Personal data may be disclosed to third parties when performing the following tasks:

- a) fulfilment of legal and contractual obligations;
- b) fulfilment of specific requests submitted by the data subject;
- c) handling complaints or disputes;
- d) prevention and repression of fraud and any illegal activity;

Personal data will not be subject to disclosure, except with the express consent of the data subject.

## 8. Data storage

Establishing how long personal data will be stored depends on how much time is needed to process it. Personal data will therefore be stored for the entire time needed to carry out the purposes stated in par. 4.

All data on electronic traffic (e.g. time and duration of the connection) will be cancelled or anonymised when not necessary to transmit the communication, unless specified otherwise by law (12 months max).

## 9. Rights of the data subject

The following rights are granted to the data subject:

- a) right to access their personal data (art. 15 of the EU Regulation);
- b) right to amend or complete their data (art. 16 of the EU Regulation);
- c) right of cancellation (right to be forgotten), pursuant to art. 17 of the EU Regulation;
- d) right to limit data processing under the conditions set out in Article 18 of the EU Regulation;
- e) right to data portability, as provided for by art. 20 of the EU Regulation;
- f) right to object to the processing of their data in any moment (art. 21 of the EU Regulation);
- g) right to lodge a complaint with Italy's supervisory watchdog (*Garante per la protezione dei dati personali*).

## 10. Exercising one's rights

In order to exercise their rights, the data subject may contact the Data Controller by writing to this certified e-mail address [amministrazione.centrale@pec.unipd.it](mailto:amministrazione.centrale@pec.unipd.it) or to the following e-mail address [urp@unipd.it](mailto:urp@unipd.it). Alternatively, the data subject may write to: University of Padova, via VIII Febbraio 2, Padova.

The Controller shall respond within one month of the request, although this may be extended by up to three months should the request be particularly complicated.

## 11. Changes to the policy

Any amendments and additions to this policy are published in the privacy section of the university website at [www.unipd.it/privacy](http://www.unipd.it/privacy).