



PRIVACY NOTICE FOR THE PROCESSING OF PERSONAL DATA

The University of Padua ("University"), in compliance with its obligations under Articles 13 and 14 of the EU General Data Protection Regulation 2016/679 ("GDPR"), provides you with information regarding the processing of your personal data. This data processing is for the purpose of inviting you to participate in reputation surveys promoted by Quacquarelli Symonds Ltd ("QS"), whose registered office is at 1 Tranley Mews, Fleet Road, London, NW3 2DG, United Kingdom. These surveys contribute to the University's positioning in international rankings.

DATA CONTROLLER: <i>University of Padua – Strategic Data and Ranking Sector (UPCS)</i> DATA PROTECTION CONTACT PERSON: <i>Office Director</i>
--

1. Sources and Types of Data Processed

The personal data processed are 'ordinary' categories of personal data and fall into the following categories of personal data and fall into the following subcategories:

- Identification and contact data: Surname, first name, email address, citizenship/nationality).
- Curriculum vitae data: Current institution or company, job role, field of study/work.

2. Purposes of Data Processing

Data are processed:

- By the University: As the Data Controller, the University processes your data to create contact lists for transmission to QS.
- By QS: As a separate and independent Data Controller, QS processes your data to facilitate your participation in its surveys.

The opinion collected through the survey contributes to the score assigned to the University within the rankings promoted by QS [QS World University Ranking, QS World University Ranking by Subject; QS Europe (Regional Ranking) and QS Sustainability Ranking].

3. Data Processing Methods

The personal data of interested parties are collected directly from them by university staff (professors, collaborators or technical-administrative staff) and entered into an application (hereinafter "Application") developed by the University. Authorized personnel access this Application via Single Sign-On (SSO).

After your data is entered into the Application, you will receive an email. This email will include information about the person who provided your contact details, a request for your consent for the University to process your data for the creation of contact lists to be transmitted to QS, and a separate request for your consent to participate in QS reputation surveys.

If there is no response after a reasonable period, up to two reminders will be sent. In the event of no response or a refusal of consent, all your data present in the Application will be permanently deleted.

The University transmits your data (surname, first name, citizenship/nationality, job role, scientific disciplinary area, organization, and email address) to QS via a dedicated platform. This transmission is solely for the purpose of QS conducting reputation surveys, which may occur within 24 months of transmission. You retain the right to withdraw your consent at any time. When QS surveys commence, a reminder email will be sent to individuals invited to participate.

QS will not contact individuals for more than two editions of their annual survey without additional or separate consent, which you can provide at the end of the survey. Participants' responses to the surveys will be combined anonymously and in aggregated form with responses from others worldwide to form academic/employer reputation indicators. These indicators are used in QS university rankings at global, regional, subject, and program levels, where relevant.

Data processing is carried out to ensure maximum security and confidentiality, using manual, IT, and telecommunications tools suitable for storing, managing, and transmitting the data.

The University does not rely on automated decision-making processes, including profiling, concerning the rights of the data subject based on personal data, in compliance with the guarantees provided by Article 22 of the GDPR.

The collected personal data are stored in PostgreSQL databases hosted on Amazon EC2 instances within the AWS Milan cloud region (Italy), adhering to the principle of data residency within national territory. Access to the database is protected by firewalls, configured to permit connections exclusively from the authorized web application server. Data transmission occurs via encrypted HTTPS protocol, and the system is further protected by a Web Application Firewall (WAF) based on Apache's ModSecurity.

Access to data is restricted solely to users authenticated via the University's SSO system, which is based on the SAML protocol (Shibboleth). Authorized users include:

- Department faculty who have entered contacts into the address book;
- Department directors;
- Department ranking contacts.

To ensure:

- a) Anonymisation, pseudonymisation, or encryption of personal data;
- b) Ongoing confidentiality, integrity, availability, and resilience of processing systems and services;
- c) The ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;

The following security and organizational measures are adopted:

- Automatic database snapshots every 24 hours, with a 7-day retention period on encrypted AWS storage;
- Backup and disaster recovery services managed by AWS, ensuring the operational continuity of the system;
- Infrastructure monitoring and automatic alerting in case of malfunctions.

The Recovery Point Objective (RPO) is a maximum of 24 hours, while the Recovery Time Objective (RTO) is estimated at less than 4 hours, consistent with the timelines provided by AWS recovery services in the specific region.

4. Legal Basis for Processing

The legal basis for processing your data for the creation of contact lists to be transmitted to QS is your consent (pursuant to Article 6(1)(a) of the GDPR) and the performance of a task carried out in the public interest (pursuant to Article 6(1)(e) of the GDPR). The relevant national regulations, as per Article 2-ter of Legislative Decree 196/2003, are:

- MUR Decree No. 773 of 10/06/2024, which sets out the "General guidelines for the programming of Universities 2024-2026 and indicators for the periodic evaluation of results." Article 1, paragraph 3, letter D, identifies the promotion of the international dimension of higher education and research among the specific objectives of the university system's three-year programming.
- The University's Performance Plan (PIAO) 2023-2027, which incorporates these guidelines (in implementation of Article 1 ter, paragraph 1, of Legislative Decree no. 7/2005). Regarding internationalization, the PIAO aims to "increase the University's reputation as a center of

excellence at an international level" and explicitly states "positioning in the main international rankings" as one of the three strategic synthetic University indicators for monitoring activities, with a target value of maintaining a top 250 ranking.

The legal basis for processing your data for participation in QS surveys is your consent (pursuant to Article 6(1)(a) of the GDPR).

5. Data Recipients

Your data may be disclosed, exclusively for the purposes outlined in Section 2, to University personnel and to collaborators (including independent contractors) who provide support for the execution and management of the project activities.

For the aforementioned purposes, in addition to specifically authorized University employees and collaborators, your personal data will be communicated to QS for the purpose of inviting you to participate in reputation surveys.

The transfer of data to the United Kingdom, where QS is based, is carried out based on the European Commission's Adequacy Decision 2021/1773.

Following the purchase of services (Academic Tracker, Employer Tracker), QS communicates aggregated and anonymized data, on which the performance indicators of the main rankings are based, to the interested Universities.

The following entities are Data Processors within the meaning of Article 28 of GDPR:

a) Fastweb S.p.A., as the successful bidder for the CRUI Convention concerning AWS services, which the University joined for the acquisition of the cloud service.

The processing of personal data by Fastweb is governed by a data processing agreement and a specific contractual addendum for the processing of personal data, signed between the University and Fastweb, acquired with Protocol No. 169008 of 12/09/2023.

Other than as stated above, personal data will not be disclosed to any other third parties.

6. Data retention period

Your data will be processed for the purposes indicated herein for a maximum period of ten years from the date consent is given, without prejudice to your right to withdraw consent at any time.

7. Data Subject Rights

As a data subject, you can exercise your rights as outlined in Articles 15 et seq. of the GDPR. You also have the right to lodge a complaint with the Garante per la protezione dei dati personali (Italian Data Protection Authority).

8. How to Exercise Your Rights

To exercise their rights, you can write to the following email address: ranking@unipd.it. Alternatively, you can write to: Università degli Studi di Padova, via VIII Febbraio n. 2, Padova, Italy.

The University typically responds within one month of receiving the request. In cases of particular complexity, the University will respond no later than three months from the request date.

9. Data Protection Officer (DPO)

The Data Protection Officer, appointed pursuant to Art. 37 of the EU Reg., can be contacted at the following email address: privacy@unipd.it.