

INFORMATION ON THE PROTECTION OF PERSONAL DATA FOR STUDENTS INTENDING TO ENROLL, OR ALREADY ENROLLED, ON A UNISALENTO STUDY COURSE

Dear Student,

the University of Salento invites you to read the following information drafted pursuant to article 13 of the EU Regulation 2016/679 "relating to the protection of individuals with regard to the processing of personal data, as well as to the free movement of such data", also known by the acronym GDPR (General Data Protection Regulation).

1. Introduction

For the purposes of this information, the student must be considered "interested", as an identified or identifiable person to whom the data refers. The term "student" also refers to those who use inbound and outbound orientation services, participate in selective procedures for access to courses with limited places or to the tests to verify initial knowledge, graduates, and students enrolled on a study course or postgraduate course.

This information may undergo changes and / or updates over time. We therefore recommend that you consult and refer to the most recent version which, even in the event of an update, remains published on the University portal in the "Privacy" section (<https://www.unisalento.it/privacy>). (<https://www.unisalento.it/privacy>).

2. Data Controller and Data Protection Officer (RDP / DPO)

The Data Controller is the natural or legal person who "determines the purposes and means of the processing of personal data" (article 4, subsection 7 of the GDPR). The Data Controller is the University of Salento with registered office in Piazza Tancredi 7, 73100 Lecce, represented by the Magnificent Rector, prof. Fabio Pollice. The contact details of Data Controller are: tel. 0832/292333, e-mail: rettore@unisalento.it, PEC (certified e-mail): amministrazione.centrale@cert-unile.it.

Pursuant to articles 37 and following of EU Regulation 2016/679, the University has appointed Dr. Giuseppina Campanile as Data Protection Officer (RDP / DPO). The contact details of the DPO are: tel. 0832/292333, e-mail: dpo@unisalento.it, PEC: amministrazione.centrale@cert-unile.it.

Data subjects "can contact the Data Protection Officer for all matters relating to the processing of their personal data and the exercise of their rights deriving from the [...] regulation" (article 38, subsection 4 of the GDPR).

3. Purpose and legal basis of the processing

Personal data may be collected from the interested party (e.g. because it is provided by the student at the time of enrollment or as part of the training course, or when requesting specific services) or from third parties (e.g. in case of transfer of the student from another University or in the case of communications from other public institutions) and are processed by the University of Salento within

the limits established by law and regulations, on the basis of at least one of the following conditions of lawfulness (legal bases pursuant to article 6 of the GDPR): the processing is necessary for the performance of the institutional tasks of public interest with which the University is invested (for the purpose of managing the educational and administrative relationship with the student, also with reference to specific services requested by the student, and for any other purpose related to the 'provision of education, training, guidance and assistance services for entering the world of work); the processing is necessary for the fulfillment of the obligations deriving from a contract with the student or from current legislation; as well as on the basis of the student's consent, where necessary.

Specifically, the University of Salento processes personal data for the following purposes:

- a) selection and admission procedures for study courses and post-graduate courses;
- b) matriculation and pre-enrollment for international students who wish to enroll in first level (undergraduate) or second level (master) degree courses in Italian or English and post-graduate courses;
- c) provision of teaching and student secretarial services relating to matriculation, enrollment and management of the university career until the qualification is obtained;
- d) matriculation, enrollment and management of the post-graduate university career (research doctorate, university masters, specialization schools, specialization courses, refresher courses, summer schools, etc.);
- e) identification of the student (e.g. by photograph of the face);
- f) verification test of initial knowledge;
- g) determination of university fees, calculation of the relative amounts;
- h) management of double degree programs;
- i) management of curricular and extracurricular internships;
- j) use of library services and electronic resources, access to laboratories and other protected structures;
- k) security management (e.g. video surveillance systems)
- l) provision of IT and digital services (e.g. University e-mail; digital e-learning platforms; e-learning services, inbound orientation, tutoring and outbound orientation in digital mode through Microsoft's Teams platforms and Google Meet, the complete list of services is available [here](#)) also to allow the assessment of the requirements for access to courses for international students and the performance of the oral and written tests relating to the exams for the period of the Covid-19 emergency: [information on the subject of protection of personal data for conducting remote written exams](#)
- m) [provision of online chat service also for non-enrolled guest students](#)
- mm) at the request of the student, provision of the federated authentication service for access to the resources of the eduGAIN and IDEM-GARR federations.
- n) verification of attendance for didactic activities with compulsory attendance;
- o) any disciplinary proceedings;
- p) elections and designation of student representatives in the governing bodies of the University and in the study courses councils / committees;
- q) at the request of the student - in accordance with the provisions of article 96 of Legislative Decree 30 June 2003, n. 196 - communication or dissemination to public and private subjects (e.g. private companies, etc.), also electronically, of data relating to training, intermediate and final results, to facilitate and encourage entry to the world of work and for purposes specifically occupational (<https://www.unisalento.it/enti-e-imprese/placement>)

- r) promotion and management of training courses and international student mobility programs; (<https://www.unisalento.it/international/erasmus-students>)
- s) [disbursement of economic benefits \(e.g. grants, exemptions, concessions and scholarships, part-time student activities 150 hours, etc.\);](#)
- t) [use of services relating to the right to university education](#)
- u) statistical and evaluation surveys relating to teaching and improvement of the services;
- v) [sending of notices and newsletters \(participation in events and / or initiatives proposed by the University\), in some cases upon demonstration of the student's consent.](#)
- w) [use of services for students with disabilities \(chronic or temporary\) and / or suffering from specific learning disorders](#)
- y) [use of facilities and services to protect motherhood](#)
- z) provision of services for students who are either in detention or in a state of restriction of personal freedom.

4. Personal data being processed and particular categories of data

Personal Data (intended as any information concerning an identified or identifiable natural person, directly or indirectly), processed by the University of Salento are:

- common data relating to the student or his / her family members or cohabitants, such as identification data, including name, surname, gender, title, marital status, address, country of residence, telephone / fax / mobile number, e-mail address, date and place of birth, country of birth;
- data relating to academic career (exams taken, marks, etc.)
- data relating to student mobility (e.g. joining the Erasmus program or other international exchanges, marks obtained for exams taken abroad)
- information contained in the application for participation in any selection procedures managed by the University (e.g. scholarships; collaborations; etc.)
- income data (e.g. ISEE) and bank details (e.g. IBAN)
- images collected during videotaping and videotaping of events and other University activities
- images collected by the cameras of the video surveillance system.

Furthermore, for the aforementioned processing purposes, "particular categories" of personal data (ex "sensitive data") may be collected and processed - upon identification of a suitable legal basis or at the request of the interested party pursuant to article 9 of the GDPR concerning:

- racial / ethnic origin (in cases where the interested parties are non-EU citizens or have obtained or intend to obtain refugee status);
- the state of health (e.g. relating to students with disabilities or pregnant; relating to the use of the counseling and psychological assistance service; relating to access to benefits - such as, for example, any reduction in university fees - reserved for certain categories of students);
- orientation and sexual life (e.g. for any adjustments to the attribution of sex);
- judicial data (e.g. in the case of users and / or students in detention, relating to criminal convictions, the commission of crimes, the provision of security measures or other measures restricting personal freedom).

The processing of these particular categories of personal data will be carried out to the extent that is strictly necessary for the purposes indicated above.

The processing of aggregate and anonymous data is outside the scope of application of the GDPR.

5. Obligatory or optional nature of providing data

The provision and processing of personal data, including the particular categories of personal data referred to in the previous paragraph, for the purposes indicated from letter a) to p) of paragraph 3 of this information, is mandatory for the establishment of the relationship between the student and the University.

The provision of personal data, including the particular categories of personal data referred to in the previous paragraph, for the purposes indicated from letter q) to z) of paragraph 3 of this information, is optional, but failure to provide it will prevent access to the use of the activities, benefits and related services.

6. Processing methods

The University of Salento, in line with the provisions of current legislation, will not use automated procedures aimed at profiling students and will process personal data, including "the particular categories of data" referred to in paragraph 4 of this statement, according to the principles established by article 5 of the GDPR of lawfulness, correctness, transparency, limitation of purposes and conservation, minimization of data, accuracy, integrity and confidentiality.

Personal data will be collected and processed in paper and / or computerized mode and will contribute to paper and / or IT archives for the administrative and didactic management of students' careers.

Student data are processed by adopting appropriate security measures to prevent unauthorized access, disclosure, modification or unauthorized destruction of data. The technical and organizational IT and / or digital measures used in maintaining the data are aimed at the stability and ethical provision of the service.

7. Data retention period

The personal data relating to the university career of the students (e.g. enrollment, exams taken and relative results, title obtained, etc.) are stored indefinitely over time, both to be able to satisfy, after some time, requests and needs expressed by the interested parties themselves, and for historical interest, based on the filing obligations imposed by the current legislation. The remaining personal data collected are kept for the period of time necessary to achieve the purposes for which they are collected and processed, or in the terms established by the current legislation (e.g. rules relating to tax and accounting obligations).

The personal data collected and processed for the purposes referred to in letters q) and v) of paragraph 3 of this statement are kept for a period not exceeding three years from the date of termination of the relationship between the student and the University (e.g. date of graduation).

The e-mail account is kept for a period not exceeding three years from the date of termination of the relationship with the student, without prejudice to the possibility for the interested party to exercise the right to data portability referred to in paragraph 10 below.

8. Subjects or categories of subjects to whom the data can be communicated or who can learn about them as Managers or Authorized Personnel

Personal data is processed for the purposes indicated above by University staff, duly trained and limited to what is necessary for the performance of their respective tasks. This includes, for example, the teaching staff and collaborators of the latter, the employees and collaborators assigned to the competent Offices of the University, any external subjects who perform activities on behalf of the University.

In addition, the University takes advantages of the support of external suppliers for the provision of specific services instrumental to the realization of its institutional activities. These subjects are appointed by the University as Data Processors and can only access the data necessary and indispensable for the provision of the requested service, according to the obligations imposed on them by the current legislation and by the contractual provisions put in place by the University to guarantee protection of personal data. In particular, they process the data in this capacity:

- providers of IT services and / or products (e.g. student career management systems: in particular CINECA; provision of e-mail and cloud computing services; online chat service for students; e-learning management platforms and other institutional activities in digital mode: in particular Microsoft and Google);
- provider of the federated authentication service for access to the resources of the eduGAIN and IDEM-GARR federations (GARR Consortium);
- provider of the service for sending text messages and personalized communications via WhatsApp;
- suppliers of cash and treasury services (e.g. for the execution of payment orders);
- security service providers (e.g. video surveillance systems);
- logistics service providers for the organization of events, ceremonies, selection procedures;
- technical-administrative service providers;
- insurance service providers;
- third party consultants and professionals (e.g. lawyers, accountants).

Personal data may be communicated to interuniversity consortia (such as, for example, AlmaLaurea) and, at the request of the student, to companies affiliated with the University to facilitate entry to the world of work and professions, pursuant to article 96 Legislative Decree 30 June 2003, n. 196.

In addition, the University can communicate the personal data processed to other public administrations, if they have to process the same for any procedures of their own institutional competence, as well as to all those public or private subjects to whom, in the presence of the relevant conditions, the communication is required by law or regulation.

These subjects will process personal data as independent Data Controllers. Therefore, the interested parties may contact them to assert, where applicable, the rights of access, rectification, cancellation, limitation of treatment, portability and opposition. These subjects include for example:

- public entities that manage the provision of research grants and / or scholarships, which promote studies and research, services for the right to study;
- public subjects with the aim of supporting entry to the world of work;
- third parties with whom the student is called to carry out internships, or other job placement activities;

- state administrations, such as MIUR (Ministry of Education, Universities and Research), the Ministry of Foreign Affairs, the Ministry of Labor, the Revenue Agency, the State Attorney, the Police Headquarters, the Embassies, the Prosecutors, the Detention Facilities;
- the judicial authority, police forces, information and security bodies;
- non-economic public bodies, such as INAIL and social security bodies;
- companies or consortia owned by the University;
- Territorial administrations, such as Region, Municipalities, the Regional Body for the Right to Education, the Employment Centers;
- Italian and foreign universities engaged in joint training courses;
- Associations, such as e.g. the Conference of Italian University Rectors (CRUI);
- Local Health Authorities;
- Promoters and financiers of prizes, scholarships and research grants.

Apart from the aforementioned cases, personal data is not communicated or disclosed to third parties in any way and for any reason.

9. Transfer of personal data abroad

In some cases (e.g. ERASMUS programs, training placements or job placements to be carried out in entities or companies located in non-EU countries) personal data may be transferred to non-EU countries. In such cases, the Data Controller ensures that the transfers will take place to countries for which there is an adequacy decision by the European Commission (article 45 and recital 103 of the GDPR) or in any case provide the adequate guarantees indicated in article 46 of the GDPR (see also recital 108). In the event of data transfer to non-EU territories or to international organizations, specific information will be provided to the interested party. In the event that an adequacy decision has not been issued by the European Commission for the country of destination, or appropriate protection guarantees and / or the indication of the means to obtain a copy of your data or of the place where they have been made available, are not available, the interested party must explicitly express their consent to the transfer, once informed by the owner of the absence of the aforementioned conditions and any risks.

10. Rights of the interested party

Pursuant to articles 15 and following of the GDPR the interested party (the person to whom the data processed refer) can exercise the following rights:

- *right of access*: has the right to obtain from the data controller confirmation that personal data concerning him or her is being processed and in this case, to obtain access to personal data to the information specified in article 15 of the GDPR;
- *right of rectification*: has the right to obtain from the data controller the correction of inaccurate personal data concerning him without undue delay and the integration of incomplete personal data, also by providing an additional declaration
- *right to cancellation*: has the right to obtain from the data controller the cancellation of personal data concerning him without undue delay, if the reasons specified in article 17 of the GDPR;

- *right to limitation of treatment*: has the right to obtain the limitation of treatment from the data controller when one of the hypotheses provided for by article 18 of the GDPR;
- *right to data portability*: has the right to receive the personal data concerning him/her provided to a data controller in a structured, commonly used and machine-readable format and has the right to transmit such data to another data controller without impediment by the data controller to whom it has provided them if the conditions set out in article 20 of the GDPR;
- *right to object*: he has the right to object at any time, for reasons related to his particular situation, to the processing of personal data concerning him in the cases and in the manner provided for by article 21 of the GDPR;
- *right not to be subjected* to a decision based solely on an automated processing, including profiling, which produces legal effects concerning him or which significantly affects his person in a similar way, according to the methods provided for by article 22 of the GDPR.

In cases where the processing of data is lawful only by virtue of the consent validly given by the interested party, the latter has the *right to withdraw consent*. The withdrawal of consent, however, does not affect the lawfulness of the processing activity carried out before the revocation (article 7, subsection 3 and article 13, subsection 2, letter c of the GDPR).

The rights can be exercised by requesting the Data Protection Officer (DPO) to the contacts indicated above.

In case of non-compliance with the request, the interested party can lodge a complaint with the Control Authority (Privacy Guarantor: <https://www.garanteprivacy.it>) pursuant to article 77 of the GDPR or bring a judicial appeal pursuant to article 79 of the GDPR.