



UNIVERSITÀ
DI PAVIA

INFORMATION SHEET REGARDING THE PROCESSING OF PERSONAL DATA OF THE UNIVERSITY OF PAVIA:

Use of the "PagoPA payment portal", pursuant to art. 13 Regulation (EU) 2016/679 (GDPR)

This information sheet is provided pursuant to EU Regulation 2016/679, hereinafter referred to as GDPR, for those who interact with the pagoPA payment portal - University of Pavia, accessible electronically at <https://payments.unipv.it>, this being the home page of the service.

This information sheet relates to the pagoPA payment portal of the University of Pavia, and not to other websites that may be also consulted by the user via hyperlinks.

As an institution of public administration and as required by law, the University of Pavia adheres to pagoPA, the electronic payments system created to make payments easier, safer and more transparent. The pagoPA system is managed by PagoPA S.p.A., the independent owner of the processing of the personal data of whomever uses the digital platform to make a payment to the public administration, regarding whom it is possible to obtain information on the processing of data.

The Data Controller

The Data Controller is the University of Pavia in the person of the Chancellor (C.so Strada Nuova n. 65, 27100 Pavia, certified email: amministrazione-centrale@certunipv.it).

The Data Protection Officer (DPO) can be reached at the following address: University of Pavia, C.so Strada Nuova n. 65, 27100 Pavia, e-mail: privacy@unipv.it, certified email: amministrazione-centrale@certunipv.it.

The internal data processor of the PagoPA payment portal is the Director of the Human and Financial Resources Area.

Purpose and legal basis of data processing

Personal data is collected for making payments due to the University through access to pagoPA, the payment system of the Italian Public Administration.

The data may be processed for purposes required by law such as the fulfillment of obligations deriving from the adhesion of the University to the pagoPA system, to respond to any requests from the Judicial Authority and the Judicial Police in relation to investigative activities, and for the investigation of computer crimes. Browsing data is used in order to check the correct functioning of the service and to support security.

Legal basis of the processing

The processing of personal data is legitimated by the following legal bases:

1. for the purposes of stipulating and executing a contract, also in the pre-contractual phase (art. 6 par. 1 letter b of the GDPR);
2. to fulfill legal obligations to which the Data Controller is subject (art. 6 par. 1 letter c of the GDPR);
3. for the carrying out of a task of public interest or connected to the exercise of public powers with which the Data Controller is invested (art. 6 par. 1 letter e of the GDPR), Legislative Decree n. 82/2005 "Digital Administration Code", DL n.179 / 2012.

Data subject to treatment

The personal data used to satisfy the purposes of this information sheet, which concerns processing, is:



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processed data provided by the interested party for making payments to the University through the pagoPA circuit: a) personal data (name and surname, tax code or VAT number); b) contact address, e-mail address, telephone number, mobile phone number, fax; c) data relating to the payment transaction to be made out to the University (transaction ID, outcome, notice number, amount, expiry date, motive, payment date); d) navigation data: the IT systems and software procedures relating to the operation of the "PA payment portal - University of Pavia" acquire, during their normal operation, personal data the transmission of which is implicit in the use of Internet communication protocols. This is information that is not gathered to be associated with identified interested parties, but which by its very nature could, through processing and association, allow users to be identified. This category of data includes the IP addresses or domain names of the computers of users who connect to the service, the addresses of the requested resources in URI (Uniform Resource Identifier) notation, together with the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the user's computer environment.

Nature of the provision of data and consequence of the refusal

The provision of the data referred to in points a) c) and d) is mandatory in order to complete the payment procedure; the data referred to in point b) is voluntary and useful for managing administrative procedures related to the payment.

Method of processing

Processing is normally carried out with the aid of IT and telematic tools designed to store and manage data; in some phases it can take place on paper and, in any case, in such a way as to guarantee its security and protect the privacy of the interested party with organizational and technological measures aimed at protecting data. Processing is carried out in compliance with the general principles of the GDPR, of lawfulness, correctness, transparency and non-excess (art. 5 paragraph 1 of the GDPR), with adequate technical and organizational measures in order to protect the privacy and rights of users; in accordance with the provisions of art. 32 of the GDPR to prevent the loss of data, illicit or incorrect use and unauthorized access and according to the provisions of the AgID Circular no. 2/2017 "Minimum ICT security measures for public administrations". Refusal to provide requested data will result in access to the service being denied.

Communication and dissemination of data

Data can be communicated:

- a) to the Bank acting as Treasurer of the University of Pavia;
- b) to the authorities responsible for inspection, and for fiscal and administrative verification;
- c) to the judicial authority in cases provided for by law;
- d) to any other public entity in cases provided for by the laws of the European Union or the Italian state.

The data will not be disclosed.

Transfer of data

The transfer of data to countries that are not part of the European Union is not envisaged.

Data retention period

The determination of the preservation period for personal data complies with the principle of the necessity for processing. The time limits for the storage of personal data generally depend on the laws and the retention times of the documents containing them. Data will be stored in accordance with the rules regarding the preservation of administrative documentation.

Rights of the interested party

The interested parties have the right to obtain from the Data Controller, in the cases provided, access to their personal data and the correction or cancellation of the same, or to limit the processing that concerns them, or even to oppose the processing (articles 15 and following of the GDPR). The specific request to the Data Controller can be submitted by contacting the DPO of the same Data Controller.

Right to complain



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The interested parties have the right to lodge a complaint with the Control Authority, as envisaged by art. 77 of the GDPR, or to apply to the appropriate judicial offices (art.79 of the GDPR).

Inexistence of an automated decision-making process

No automated process will be adopted, including profiling pursuant to art. 22, paragraphs 1 and 4, of the GDPR.