



**INFORMATION FOR USERS (aspiring students, freshmen, students enrolled in all courses/schools of specialisation/master's courses, and graduates)**  
**OF THE UNIVERSITY OF PAVIA CONCERNING THE PROCESSING OF PERSONAL DATA** pursuant to art. 13 of Regulation (EU) 2016/679 -GDPR

### **Data controller**

The Data Controller is the University of Pavia in the person of the Chancellor. Contact details: the legal address is Corso Strada Nuova 65, 27100 Pavia, certified e-mail: [amministracioncentrale@certunipv.it](mailto:amministracioncentrale@certunipv.it)

The University of Pavia, as Data Controller, informs users (aspiring students, freshmen, students enrolled in all courses / schools of specialization / master's course and graduates) as to the use of personal data that concerns them, including data relative to particular categories (by way of example only: data on one's general state of health, adhesion to a political student association, information on racial origins, the presence of disabled people in the immediate family, etc.) that is collected from the interested parties or from schools and universities attended before or during the users' university studies. The processing of such data is essential for the carrying out of tasks assigned to the University, and for the provision of educational and auxiliary services for users. Specific information can be made available for particular cases if required.

### **Data Protection Officer**

The University of Pavia has appointed its own Data Protection Officer (DPO). Contact details: Corso Strada Nuova 65, 27100 Pavia, IT, telephone no. +39 0382/985490, Email [privacy@unipv.it](mailto:privacy@unipv.it), certified e-mail: [amministrazione-centrale@certunipv.it](mailto:amministrazione-centrale@certunipv.it) **Purposes of the data processing – legal basis:**

Personal data that is collected and processed includes:

- a) data provided directly by users when registering online, when signing up for admission tests to courses that have a *numerus clausus*, when officially enrolling at university, when submitting the application for a degree, or upon admission to PhD courses, graduate schools, master's courses, schools of specialisation, calls for tenders;
- b) fiscal and remuneration data entered on-line at the time of the initial university enrolment or when enrolling for subsequent years of a course, or else provided for reasons connected to the payment of university fees;
- c) data provided from time to time by users in relation to the request for a specific service;
- d) data relating to students' university studies;
- e) data provided at the time of registration for state examinations held at the University of Pavia.



The data will be processed in accordance with the objectives of Regulation (EU) 2016/679 (GDPR), in particular those for the carrying out of institutional duties that are of public interest or otherwise related to the exercise of its public powers, including obligations required by law for the purpose of managing the didactic/administrative/working relationships between the university and students, and/or for purposes related to the election of student representatives to academic bodies, or for purposes related to any part-time collaborations of students at University facilities, as well as for the provision of specific services requested by users. The processing of data may also take place for historical, statistical or scientific purposes, including the objectives of archiving, historical/scientific research, and analysis for statistical purposes, in compliance with the law and codes of ethics. The University may carry out research activities aimed at analysing possible improvements to its services provided this does not allow direct identification of the interested party. Personal data will be processed in accordance with the legal, for purposes related to employment placement.

Processing is usually performed with the help of IT and telematic tools to store and manage data; some phases of the processing can be carried out on paper and, in any case, in such a way as to guarantee security and protect the confidentiality of the interested party, with organizational and technological measures adopted to protect data.

#### **Nature of the provision of data and the consequences of refusal**

The provision of data is, in general, mandatory. Failure to provide the data referred to in the above paragraph "Purposes of the data processing," points a), b), d) and e) precludes the establishment and continuation of a relationship with the University. Failure to provide the data indicated in point c) results in the impossibility of accessing the services requested.

#### **Categories of subjects to whom data may be communicated or who can come into contact with such data in their capacity as data processors or persons in charge of processing – receivers of data**

Users' personal data may be accessed and processed, in compliance with current legislation on the subject, by personnel and collaborators of the University or companies expressly appointed as data processors.

Data obtained by the University may be communicated to other public entities, with the exclusion of public sector bodies, with whom the University exchanges information in the fulfilment of its institutional duties.

Substitutive declarations provided by users pursuant to D.P.R. 445/2000 (as amended by Law 183/2011) will be subject to the controls required by current legislation, and false declarations will be reported to the competent judicial authorities.

In particular, data may be may be divulged:



- to the Ministry of Education, University and Research (M.I.U.R.) for inclusion on the National Register of Students (established by Law No. 170/2003), to monitor the academic progress of all university students;
- to the Ministry of Finance;
- to the Ministry of Labour and Social Policies;
- to local authorities, for the purpose of making subsidies available to particular categories of students;
- to the Government Legal Service, Ministry of Foreign Affairs, Police Headquarters, Embassies, the Public Prosecutor's Office regarding residence permits, and the recognition of special status;
- to the Region, to other accredited or authorized public and private operators, and to potential employers for the orientation and placement of students and University graduates to the world of work (pursuant to law 30/2003 regarding the reform of the labour market and subsequent implementation);
- to insurance companies for procedures involving injury
- to Regional Management Bodies (institutions established pursuant to Law No. 390/91 regarding the right to higher education), EDiSU and other institutes to favour the international mobility of students, for the purpose of assessing the economic benefits and allocation of housing (Law No. 390/1991 and Regional Laws on the subject) and other subjects in the context of participation in international programs.

Judicial authorities (Penal Code [C.P.] - Italian Code of Criminal Procedure [C.P.P.] )

Personal data will also be made available to the bank that, in agreement with the University, manages the collection/reimbursement of taxes and university fees.

Such data may also be made available to subjects and bodies engaged in studies or activities having historical, statistical or scientific aims, always in compliance with Regulation (EU) 2016/679 (GDPR).

Data regarding one's general state of health, political, religious or trade union opinions, membership of a political student association or a political party, information on racial origins, etc., and judicial data can be communicated, in the pursuit of the purposes above indicated, only where required by law or regulation. However, the communication or dissemination of data required by law enforcement agencies, judicial authorities, information and security bodies or other public entities for defence purposes, security of the state and ascertainment of crimes, as well as communication to judicial authorities in compliance with legal obligations, is in any case guaranteed, in compliance with the law, where there are alleged criminal offences.



Data may also be disclosed to some external parties, identified as external data processors (e.g. CINECA) to which the University assigns services of outsourcing, or with which conventions or agreements are put into place. Collected data will not be transferred to countries outside the EU except in special cases, such as for exams taken abroad (non-EU countries), following specific notification.

## **Storage**

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 parties**

The interested parties have the right to ask the Data Controller to be able to access personal data and to correct or cancel it, as well as to limit or oppose its processing (Articles 15 and following of EU Regulation 679 / 2016). The appropriate application is to be presented to the Data Controller, , even c/- the Data Protection Officer (DPO), Corso Strada Nuova 65, 27100 Pavia, certified email: [amministrazione-centrale@certunipv.it](mailto:amministrazione-centrale@certunipv.it). The parties concerned, given the necessary conditions, also have the right to lodge a complaint with the supervisory authority in accordance with the procedures set out in Article 77 of EU Regulation 679/2016, or to take action pursuant to Article 79 of the Regulation.

2024