Information on the processing of personal data for access to University buildings during the Covid-19 health emergency

Regulation EU 2016/679, the “General Data Protection Regulation” (GDPR), provides that everyone has the right to the protection of personal data concerning him or her. In compliance with articles 13 of the Regulation, the University of Trento provides data subjects with the information below.

1. Data controller

The data controller is the University of Trento, via Calepina n. 14, 38122 Trento (TN); email: ateneo@pec.unitn.it; ateneo@unitn.it

2. Contact details of the data protection officer

Data subjects can contact the Data protection officer to obtain information on their personal data and to exercise their rights under article 15 et seq. of the regulation here: via Verdi n. 8, 38122 Trento; email: rpd@unitn.it.

3. Purpose of the processing and legal basis

In the framework of legal provisions adopted at national level to tackle the Covid-19 emergency, the personal data of data subjects are processed by the University of Trento in order to: (i) ensure that safety protocols adopted in compliance with national and provincial laws are implemented, and specifically the provisions included in the "Joint protocol regulating the measures adopted to fight and contain the spread of Covid-19 in workplaces", of 14 March 2020, as amended (grounds of public interest); (ii) comply with the requirement to ensure the safety of the workplace (article 32 of the Constitution, article 2087 of the Civil Code, article 20 of Legislative decree 81/2008, as amended).

1 See https://www.unitn.it/ateneo/89052/covid-19-fase-3
4. **Categories of processed data**

The categories of processed data include personal data, professions or positions, places of work, the justification to access the building.

5. **Acquisition of data**

The submission of personal data is required for access to University buildings; if you do not provide personal data you will not be granted access.

6. **Methods of the processing**

The processing of personal data is carried out manually and by automated means. The data are processed lawfully, fairly and transparently, in a manner that ensures appropriate security, is relevant and limited to what is necessary in relation to the purposes for which they are processed. Data are processed using:

- the web application that manages access requests and authorisations to UniTrento buildings;
- the UniTrentoApp mobile app to check in and out of buildings;
- the paper form to request access to University buildings.

No profiling is carried out, and decision are not taken solely by automated means.

7. **Categories of recipients of the personal data**

The personal data will be processed by authorised staff and, in case of confirmed Covid-19 diagnosis, by the competent doctor and by local health authorities (to carry out an epidemiological survey); data may also be transferred to third parties to comply with legal requirements and/or with a court decision.

8. **Data storage period**

Data are stored for not more than 14 days, but may be stored for longer periods if required by public health authorities.
9. Rights of the data subjects

The data subject shall exercise the rights referred to in article 15 et seq. of the GDPR at any time. In particular, data subjects have:

- the right to access to personal data and other information (GDPR, article 15);
- the right to the rectification or completion of personal data;
- the right to erasure of personal data (for exceptions see article 17, paragraph 3, of the GDPR);
- the right to the restriction of processing of personal data (see article 18 of the GDPR);
- the right to object to processing of personal data concerning them, where applicable.

Data subjects can exercise their rights through the form available at the "Privacy and data protection" page on the University's website. Fill in the form and email it to the Data protection officer (see above for contact details).

In case there is an infringement of the GDPR on the processing of personal data, data subjects have the right to lodge a complaint with the Italian data protection authority or to engage in legal proceedings by virtue of article 77 of the GDPR.

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