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” (hereinafter “GDPR”), provides that everyone has the right to the protection of personal data concerning him or her.

In compliance with article 13 of the GDPR, the University of Trento provides all university staff and students (hereinafter “data subjects”) with the information below.

1. Data controller
The Data controller is the University of Trento, via Calepina 14, 38122 Trento, email: ateneo@pec.unitn.it; ateneo@unitn.it.

2. Contacts details of the Data Protection Officer
The Data Protection Officer (DPO) can be contacted to request information on personal data at the following email address: rpd@unitn.it.

3. Purpose of the processing and legal basis
The University of Trento processes personal data as part of the performance of its public interest tasks (article 6(1), point e) and article 9 (2), points b) e g) of the GDPR) as well as for the fulfilment of legal obligations (article 6(1), point c) of the GDPR) and, in particular, in relation to the Covid-19 emergency, exclusively to 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, and to provide its services and face-to-face activities in a safe environment as required by article 9 ter of Decree Law No. 111/2021.

4. Categories of processed data
The categories of processed data include personal data, professions or positions, places of work, self-declaration on health self-check, self-declaration on the Covid-19 green certificate requirement, outcome of the red light of the system, medical certification of exemption from the green certificate.

5. Acquisition of data
The provision of personal data is essential for access and permanence in University buildings. If you do not provide the data you will not get access.

6. Data processing methods
The processing of personal data shall be carried out manually and by automated means by authorised staff, according to their tasks. Personal data shall be processed lawfully, fairly and transparently, in a manner that is
adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (GDPR, article 5(1)).

In particular, the personal data processing takes place in the following ways:
• web application to manage the flows of requests, authorizations, delegations for access to University buildings;
• UniTrentoApp Mobile application for check-in / check-out from University buildings;
• written self-declaration for access to University buildings.

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

7. Recipients of 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. Period of storage

Data are stored for not more than 14 days, but may be stored for longer periods if required by public health authorities or to comply with legal requirements and/or with a court decision.

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 following rights:
• right of access to his/her own personal data and to other information as mentioned in art. 15 of GDPR;
• right to rectification of his/her own personal data when inaccurate and/or their integration when incomplete;
• right to erasure (‘right to be forgotten’) of his/her own personal data, except when the University is obliged to data storage to comply with article 17 (3) of the GDPR;
• right to restriction of processing as per article 18 of the GDPR;
• object to processing of personal data concerning him or her when allowed.

To exercise their rights, data subjects can use the form available on the University web page “Information on the processing of personal data”, fill in and email it to the Data controller (see contact details above).

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.
This privacy notice, version 1 September 2021, might vary or be updated.

Data subjects are advised to regularly check it and to refer to the up-to-date version.