

Information on the processing of student personal data

Regulation EU 2016/679, the "General Data Protection Regulation" (GDPR), provides that everyone has the right to the protection of personal data concerning them.

In compliance with article 13 and 14 of the GDPR, the University of Trento provides its students (hereinafter also the "data subjects") with the information below.

1. Data controller

The data controller is the University of Trento, whose address is via Calepina 14, 38122 Trento, and email: ateneo@pec.unitn.it; ateneo@unitn.it.

2. Contact information of the Data protection officer

The Data Protection Officer can be contacted at the following email address: rpd@unitn.it.

3. Purposes of the processing

The University of Trento is a public institution dedicated to education, research and knowledge dissemination in the public interest. In the fulfilment of these missions, which are connected to each other, the University has relationships with individuals (students) who use the educational or education-related services it provides for admission, registration, study, employment purposes, and in other activities that are part of the university experience and of the University's other missions. In particular (this is an indicative, non-exhaustive list), the controller performs the processing of student personal data (including particular and judicial data) for the following purposes:

ADMISSION AND ENROLMENT

- a) admission procedures for degree programmes, restricted access courses and postgraduate courses;
- b) registration and enrolment procedures and related activities, including for the identification of the students through digital photo;
- c) enrolment procedure and postgraduate study (doctoral studies, university master's courses, specialization schools, advanced courses, continuing professional development, summer school, etc.);

UNIVERSITY CAREER

- d) academic activities: processing of data provided directly by the student during teaching activities (classroom, laboratory, online activities, etc.), for educational purposes (opinions, ideas, various information, etc. deriving from the interaction between the student, the participants in the lecture, and teaching tools);
- e) the provision of support to students who request it regarding the services offered by the University, and the provision of aids and extra time to take the admission test and exams, as well as the use of the Inclusion Service (for eligible students who have submitted their application);
- f) curricular and extracurricular internships;
- g) use of the University IT services, such as the university email, the 'online collaboration platform', digital platforms for e-learning (e.g. Moodle) or innovative education (surveys, platforms such as Google, LimeSurvey), Esse3, online forms (Apply2 and Form2), and other electronic resources;
- h) enrolment and attendance of University language courses (at the University Language Centre - CLA);
- i) participation in national and international student mobility programmes;

- j) enrolment and attendance of courses at the Test centre;
- k) use of the University's library services;
- l) employment opportunities for students ('150 ore' student work, tutoring, other types of collaboration);
- m) access to restricted-access laboratories and facilities;
- n) access to the student counselling service;
- o) registration to the Alumni community;
- p) publication of information on dissertations and theses in the University catalogue;

ADMINISTRATIVE AND ACCOUNTING PROCEDURES

- q) management of the students' career until the award of the qualification: provision of educational activities, organization of exams and remote exams, management of study plans, registration of exams, attendance taking at compulsory activities, degree application, application for suspension of studies;
- r) performance of administrative, accounting, fiscal activities, related to admission, registration and enrolment procedures in years after the first one, including the calculation and collection of university fees and the provision of student benefits for eligible students and checks on self-certifications provided pursuant to Presidential Decree 445/2000;
- s) award of scholarships and/or other forms of financial support, provision of services and activities for the right to study, such as exemptions, benefits, software and/or hardware loans, the provision of student aids, etc.;
- t) use of the university email address for administrative and similar purposes, and use of the personal email address for administrative and similar purposes (e.g. notifications on ongoing procedures, helpdesk requests, password reset procedure, etc.);
- u) disciplinary procedures;
- v) election (usually held electronically) of student representatives in University bodies and, for the elected students, the performance of the relevant tasks;

ORIENTATION AND JOB GUIDANCE SERVICES

w) orientation for prospective students, tutoring and job guidance for graduating students, activities aimed at student employability, including through communications to private and public organizations and inter-university consortia exclusively for employment/professional purposes and, through monitoring of the employment situation of students over time, including after the completion of their studies and/or their post-graduate academic career, carried out both internally and in collaboration with public entities, private entities and inter-university consortia, to improve orientation and job placement activities and to update the offer of courses. In case of collaboration with such entities, the students' personal data will be shared with them. Also in this case, such entities could operate as independent Data Controllers or as Joint Controllers with the University pursuant to Article 26 of EU Regulation 2016/679. Where there are Joint Controllers, the data subjects may request access to the essential content of the agreement between the University and these entities by contacting the University's Data Protection Officer.

OTHER EDUCATION PURPOSES

x) provision of information by email, where the data subjects have given their consent, on research projects conducted by University researchers; the purpose of such communications is to check if the recipient is interested in joining the project (if so, the recipient must give their consent);

y) telephone or email interviews, audio-video recordings for University communication campaigns (including on social media and website) ;

z) video surveillance of University facilities;

aa) application of safety measures in the workplace in accordance with the provisions of Legislative Decree 81/2008, as amended;

bb) administration of questionnaires/surveys by the University to improve the educational experience, the services and/or the assistance provided to students.

4. Legal basis of the processing

The processing of personal data for the above purposes is carried out by the controller under at least one of the following lawfulness conditions:

- for the performance of a task carried out in the public interest, as described in particular by law 590 of 14 August 1982 establishing the University of Trento, by legislation in force, by the Charter of the University of Trento and by internal regulations;
- for compliance with a legal obligation (article 6(1)(c), GDPR);
- for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (article 6(1)(b), GDPR);
- by default, based on explicit consent of data subject (article 6(1)(a), GDPR).

The processing of personal data included in "special categories of personal data" (formerly 'sensitive data') and of judicial data is carried out by the controller under at least one of the following lawfulness conditions:

- for reasons of substantial public interest, on the basis of EU or Italian law under article 9(2)(g) of the GDPR and article 2-sexies, paragraph 2, point bb) "istruzione universitaria" of Legislative decree 196/2003, as amended;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes under article 9(2)(j) of the GDPR and of article 2-sexies, paragraph 2, point cc) of Legislative decree 196/2003, as amended;
- for the establishment, exercise or defence of legal claims;
- by default, based on the data subject's explicit consent (article 9(2)(a), GDPR).

5. Categories of processed data

General personal data: personal details, address of residence and domicile, contact information (university and personal email addresses, phone number); student ID; admission information, registration information, number of the ID provided for registration purposes, information on student progress, access credentials, bank information; names, income and tax information of the data subject and their family, images (in audio-video footage, photos), any disciplinary measures.

Special categories of data: health data (for example, data included in disability documents to obtain benefits or exemptions), gender identity data (for transitioning students), data revealing racial and ethnic

origin, religious and philosophical beliefs; political opinions (for example in the election of student representatives).

Judicial data: data relating to criminal convictions and offences, to the extent necessary for the performance of the data controller's public interest tasks.

6. Acquisition of data

The provision of data for the above purposes is necessary for admission and enrolment as a student, registration in a programme of study, the management of the student career and to fulfil administrative, accountancy and tax procedures.

For certain services and activities the provision of data is voluntary. However, failure to provide personal data may prevent the University from providing the services or the data subject's participation in activities and projects, or the granting of benefits.

The provision of special categories of data to obtain aids and additional time to sit exams is optional, but failure to do so makes it impossible for the University to provide such aids and additional time.

7. Source of the personal data

The personal data are usually collected from the data subjects.

In some cases, data can be obtained from other sources, such as public databases (SPID, ISEE), public administrations, criminal records, tax assistance centres, other universities or organizations having agreements with UniTrento for curricular or extracurricular activities.

8. Data processing methods

The processing of personal data shall be carried out manually and/or by automated means by authorized staff. 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, ensuring integrity and confidentiality of data (article 5(1), GDPR).

No automated decision-making processes are used, and no profiling is carried out.

9. Movement of data and Categories of recipients of the personal data

In compliance with articles 28 and 29 of the GDPR, the data are processed by the controller including through individuals mandated by the controller and data processors.

Where the University and a third party process data together, jointly determining the purposes and means of processing, they will do so under a specific arrangement in accordance with article 26 of the GDPR.

The personal data held by the University for the performance of one of the tasks above may be disclosed to public or private organizations where that is necessary. Such organizations may include, for example: MIUR (the Ministry of Education, Universities and Research), the Ministry of Public Administration, the Ministry of Economy and Finance, CUN (National University Council), CINECA, Opera Universitaria, Trentino Trasporti, CUS Trento, insurance companies, banks, the National Revenue Agency, tax centres (CAF), exam committees, organizations auditing self-declarations under Presidential decree 445/2000, embassies, consulates, police forces, Guardia di Finanza, the prosecuting authority (Avvocatura dello Stato), judicial authorities; Italian and foreign private organizations, university consortia, companies, Almalaurea. The data can be disclosed at the request of the data subjects, to comply with an agreement with them, with their express consent, to confirm the award of qualifications or compliance with certain requirements and/or for orientation, education and employability purposes or participation in international mobility programs.

In any case, the personal data can be disclosed to third parties to comply with a legal obligation, a legal provision or court decision.

Personal data may be published on the University website to comply with publication and transparency requirements provided for by current legislation and University regulations.

10. Transfer of data to non-EU countries

Within the scope of the above purposes, personal data may be transferred to non-EU countries (outside the EEA), for example to foreign universities, research institutions, public and private organizations, in the framework of international mobility programs, internship programs, research projects and other activities taking place outside of the European Union.

In these cases, the transfer of data will be carried out within the limits and under the conditions provided for by articles 44 et seq. of the GDPR, that is, alternatively, on the basis of an adequacy decision by the European Commission pursuant to article 45 of the GDPR or, in the absence of such a decision and under certain conditions, subject to appropriate safeguards, including the signing of standard data protection clauses (SCCs) pursuant to article 46 of the GDPR, or on the basis of derogations for specific situations pursuant to article 49 of the GDPR.

11. Data storage period

The data will be stored as long as necessary to fulfil the purposes for which they were collected, and in any case as long as it is required by law. The data will be stored as long as required by the regulations in force and/or by the University rules on the management and storage of documents generated by its activities. In particular:

- personal information and registration, enrolment, student career and graduation data will be stored permanently, including for compliance with archiving purposes under current legislation;
- data relating to admission and recruitment procedures (rankings, minutes, etc.) will be kept permanently;
- the digital identities necessary for the use of ICT services will be kept permanently for the technical management of the University's digital identities;
- online activity data (e.g. connection time and duration) and data on the use of computer systems will be stored for a maximum period of six months, unless otherwise provided by law;
- data relating to any disciplinary procedures will be kept permanently;
- the data collected to access specific services will be kept until the data subject continues to use the service, without prejudice to the possible existence of a legal obligation to store such data.

12. Rights of the data subjects

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

- the right of access to personal data and to other information listed in article 15 of the GDPR;
- the right to rectification of inaccurate personal data and/or the right to have incomplete personal data completed;
- the right to erasure except where the University has an obligation to store the data under article 17(3), of the GDPR;
- the right to restriction of processing where the cases listed in article 18 of the GDPR apply;
- the right to object to processing of personal data concerning them, where that is possible;

The data subjects can exercise their rights through the form available in the "Privacy and data protection" page on the University website.

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 a data protection authority or to engage in legal proceedings by virtue of article 77 of the GDPR.

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