



Information on the processing of personal data in the framework of the PhD Programme in MANAGEMENT

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

Pursuant to articles 13 and 14 of the GDPR, the Joint Controllers provide the following information to those who participate in selection procedures for admission to PhD Programmes, to PhD students as well as to PhD holders (hereinafter "data subjects").

More specific notices will be provided in relation to particular processes, procedures and/or provision of services.

1. Joint Controllers

The Joint Controllers are:

- **University of Trento**, via Calepina n. 14, 38122 Trento (TN); e-mail: ateneo@unitn.it; ateneo@pec.unitn.it.
- **Free University of Bozen-Bolzano**, Piazza Università, 1, 39100 Bolzano BZ.

Pursuant to Article 26 of the GDPR, the Joint Controllers act under an internal agreement defining their respective responsibilities for compliance with the obligations under the Regulation. The essential content of this agreement is made available to the data subject upon request to one of the following addresses:

- UniTn: e-mail: rpd@unitn.it;
- UniBz: e-mail: privacy@unibz.it.

2. Contact details of the Data Protection Officer

The Data Protection Officer (DPO), who can be contacted for information concerning your personal data, is available at the following email addresses:

- For the **University of Trento**: rpd@unitn.it.
- For the **Free University of Bozen-Bolzano**: administration@pec.unibz.it.



3. Purposes of the data processing and legal framework

In the fulfilment of its activities and to comply with its legal obligations (article 6(1)(e) and (c); article 9(2)(g) and article 10 of the GDPR; art. 2 sexes of Legislative Decree 196/2003, as amended), the Joint Controllers process the personal data of the data subjects for the following purposes:

- a. Identification of the members of the Academic Board;
- b. Management of selection procedures (publication of the call, collection of applications, identification and appointment of the members of the selection's Committee);
- c. Management of enrollment and registration procedures;
- d. Execution of teaching and tutoring activities provided for by the course;
- e. Scholarships' payment and/or other forms of financial support;
- f. Activation of internships with public and private entities, both Italian and foreign, within the framework of the Course;
- g. Organization of joint and/or curricular research and training events;
- h. Management of the PhD candidates' academic careers until the awarding of the degree (Doctor of Philosophy, abbreviated as "PhD");
- i. Issuance of the joint degree of Doctor of Philosophy.

Processing carried out as independent Data Controllers:

The University of Trento and the University of Bolzano-Bozen will carry out as independent controllers further processing activities, different from those mentioned above, necessary for the provision of the joint course, such as:

- a. processing of personal data necessary for access to the respective operational and scientific facilities for study and research activities within the PhD Programme;
- b. provision of organizational, IT and telematic services to support study and research activities;
- c. provision of canteen services;
- d. protection of health and safety of PhD students in their premises and laboratories;
- e. insurance coverage for Third Party Liability and workplace accidents in cases provided for by the agreement.

For the above and further processing carried out as independent Controllers, the data subject is invited to consult the following general notices:



- For the University of Trento: “Information on the processing of personal data in the framework of the University doctoral programmes”, available at: <https://www.unitn.it/it/privacy>;
- For the University of Bolzano-Bozen: “*Privacy policy for the processing of personal data of students within the meaning of Articles 13 and 14 of the European Data Protection Basic Regulation 2016/679*” available at <https://guide.unibz.it/en/navigation/privacy-policy/>.

4. Categories of processed data

Within the scope of the above purposes, the following categories of data are processed:

- Personal data: identification data, residential and domicile address, contact details (University email, telephone number), digital photograph; student ID number; data relating to academic career, including previous career (including publications, participation in seminars/conferences, research abroad), any employment history data, bank account details, asset data (e.g., ISEE), income and tax data, identification, income and tax data of cohabiting family members, images (contained in audio-video recordings, photographs); personal email address only for PhD holders and for those registered to the Alumni Community; any disciplinary sanctions;
- Special categories of personal data: relating to health (e.g. those contained in disability/invalidity documentation); data relating to gender identity (e.g. gender transitions during career); data revealing racial and ethnic origin; religious and philosophical beliefs; political opinions (e.g. in the context of the electoral procedures for PhD student representatives);
- Data relating to criminal convictions and offences, as far as strictly necessary for the performance of the Data Controller's public interest tasks.

5. Nature of data provision

- The provision of personal data for the above purposes is essential for the admission, registration and enrolment of data subjects in PhD Programmes, for the management of their career, and for the fulfilment of connected administrative, accounting and tax obligations.



For the purposes indicated above, for which the use of the service/activity is left to the exclusive choice of the data subjects, the provision of data is optional, but failure to provide them makes it impossible to benefit from them.

6. Source of the data

- Personal data are normally collected from data subjects.
- In some cases, they may be obtained from other sources, such as public databases (SPID, ISEE), public administrations, criminal records, tax assistance centres.

7. Data processing methods

The processing of personal data shall be carried out manually and by automated means by staff authorized to process data in relation to their assigned tasks and in compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, accuracy, limitation, integrity and confidentiality (art. 5(1) GDPR). No profiling or automated decisions are made.

8. Categories of recipients and scope of circulation

In pursuit of the purposes described in paragraph 3 and based on the legal frameworks cited therein, personal data will be processed by the Joint Controllers' staff authorised under art. 29 of the GDPR and by data processors appropriately appointed under art. 28 of the GDPR.

Personal data may be disclosed to the following recipients: third parties (public and/or private) for the fulfilment of the aforementioned purposes as well as for compliance with legal, regulatory and/or contractual obligations. Such entities may include: MUR; ANVUR; ISTAT; Department of Public Administration; MAECI; MEF; CUN; CINECA; Opera Universitaria; Treasurer; Trentino Trasporti; CUS Trento; insurance companies; Revenue Agency; CAF; examining committees; certifying administrations in the control of self-certifications pursuant to Presidential Decree 445/2000; Embassies; Consulates; Police Headquarters; State Advocacy; Judicial Authorities; Information Center on Mobility and Academic Equivalencies (CIMEA); foreign universities and academic institutions, within the framework of conventions for doctoral courses with joint, double or multiple degrees and for doctorates in co-tutelle; public and private entities, including foreign ones, for the financing of doctoral scholarships based on agreements pursuant to Law no. 240/2010; private parties, including foreign ones (such as companies, corporations, Almalaurea) at the request of the data subjects or with their express consent, to confirm qualifications/requirements and/or to facilitate job placement.



Outside these cases, personal data may be communicated to third parties only to comply with a legal obligation or a provision of the Judicial or Public Authority.

Personal data may be published on the portal of UniTN and UniBz in cases provided for by law and/or internal regulations. Doctoral theses must be deposited in electronic format in the National Registry of Doctoral Students and at the National Central Libraries of Rome and Florence (Ministerial Decree 226/2021, art. 14).

8.1 Transfer of data to non-EU countries

Within the scope of the above purposes, personal data may be transferred to non-EU countries, for example to universities, research institutions, public and private organizations in the framework of international mobility programmes, internships, research projects and other activities carried out outside the European Union. Such transfer will be carried out within the limits and conditions of articles 44 et seq. of the GDPR, namely in the presence of:

- an adequacy decision of the European Commission pursuant to art. 45 GDPR;
- adequate safeguards such as standard data protection clauses (SCCs) pursuant to art. 46 GDPR;
- in the absence of the above, on the basis of derogations pursuant to art. 49 GDPR, including important reasons of public interest under art. 49(1)(d) GDPR.

9. Data retention period

Personal data will be stored as long as necessary to achieve the purposes mentioned above. In any case, for the period established by the applicable regulations and/or by the policies of the Joint Controllers regarding the management and retention of documentation produced by the University during its institutional activities.

In particular, regarding the University of Trento:

- data relating to enrolments, registrations, academic records, and degree attainment will be retained indefinitely, also taking into account archiving obligations under applicable regulations;
- data relating to selection procedures/competitions (such as rankings, minutes, etc.) will be retained indefinitely;
- digital identities required for accessing ICT services will be retained indefinitely for the technical management of the University's digital identities;



- traffic data (e.g., connection time and duration) and data relating to the use of IT systems will be retained for a maximum period of 6 months, unless otherwise provided by law;
- data collected for the provision of specific services will be retained until a request for service deactivation is made, without prejudice to any legal obligation requiring their retention.

10. Rights of the data subjects

Data subjects may at any time request information on the essential content of the joint controllership agreement or exercise the rights under articles 15 et seq. of the GDPR:

- **access to their personal data** and to the other information referred to in Article 15 of the GDPR;
- **rectification of their personal data** if inaccurate and/or completion where incomplete;
- **erasure** of their personal data, except in cases where the University is required to retain them pursuant to Article 17(3) of the GDPR;
- **restriction of processing** in the cases set out in Article 18 of the GDPR;
- **data portability** in the cases set out in Article 20 of the GDPR;
- **objection to the processing** of personal data concerning them in cases where this is permitted pursuant to Article 21 of the GDPR;
- **withdrawal of consent** without affecting the lawfulness of processing based on consent before its withdrawal.

by contacting any of the Joint Controllers, at their respective institutional contact details, and their respective Data Protection Officers, as indicated in points 1 and 2 of this privacy notice.

Data subjects who believe that the processing of their personal data violates the GDPR have the right to lodge a complaint with the Italian Data Protection Authority or to bring the matter before the competent judicial authorities, pursuant to Article 77 of the GDPR.

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