



UNIVERSITÀ DEGLI STUDI DI TORINO

Direzione Didattica e Servizi agli Studenti

## Statement on how student personal data is processed

Version No.1 dated 19 July 2018

### General statement on processing students' personal data in accordance with the General Data Protection Regulation - EU 679/2016 and Board Meeting of 27 April 2016.

To whom it may concern,

**In accordance with Art. 13 of the EU Regulation 2016/679 (GDPR)**, the following information is available in order to increase students' awareness of the characteristics and methods of processing their data:

#### a) Identity and contact data

The data processing "Owner" is the Università degli Studi di Torino (University), with head office in Via Verdi 8 – 10124 Torino: certified email (Pec): [ateneo@pec.unito.it](mailto:ateneo@pec.unito.it) - email: [rettore@unito.it](mailto:rettore@unito.it): legal representative: The Dean (*pro tem*).

#### b) Data Protection Officer contact data (DPO)

The University Data Protection Officer can be contacted at: [rpd@unito.it](mailto:rpd@unito.it).

#### c) Processing purposes and legal basis

Data is processed in complete respect of the law, fairness, transparency, and within the purpose and storage limitation, minimisation, accuracy, integrity, confidentiality and responsibility as per Art 5 of GDPR.

As process Owner, the University will process the data you have provided concerning yourself or your family under Art. 6 lett. e) of GDPR "*processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller*". In particular, data will be collected and processed, either on paper or digitally, for university purposes including:

- 1) initiatives and orientation activities;
- 2) admission tests for degree courses (where necessary) and TARM (minimum requirement test);
- 3) lesson, labs and seminars;
- 4) student requirements from enrolment to graduation, communication, storing and archiving all relevant documentation;
- 5) support for students in achieving recognition of their professions (national exams);
- 6) support for students in achieving a specialist diploma;
- 7) obligatory and optional internships;
- 8) tutoring initiatives;
- 9) work experience initiatives;
- 10) course assessments and customer satisfaction surveys (both pooled and anonymous);



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- 11) applying safety measures at work according to Legislative Decree. 81/2008;
- 12) statistics, historic and scientific research surveys (both pooled and anonymous);
- 13) support for students needing extra help;
- 14) support for disabled students and those with learning difficulties;
- 15) University admin, focus and research news about seminars, events and conferences);
- 16) \* application of student contribution;
- 17) \* benefits, grants and scholarships and other services concerning the right to study at university;

\* In accordance with Art.14 of GDPR, the University will apply benefits to the student contribution by using the ISEEU value, details of immediate family members, as well as all information provided by the S.V. in the DSU, as it is pertinent and not excessive for this aim, directly from the INPS data base and applying D.P.C.M. 5 December 2013, No.159.

Under Arts. 9 and 10 of GDPR, certain categories of personal data that reveal racial or ethnic origin, political opinions, religious beliefs and philosophies and trade union membership can be collected and processed in certain situations as well as genetic data, biometric data in order to unequivocally identify a physical person, data concerning health or sex life or orientation and personal data concerning criminal records or security measures.

### **d) Recipients and possible recipient categories of personal data**

Data processed for the purposes mentioned above will be shared with or made available to the teaching staff, admin staff or those assigned to the relevant University offices as references for the protection of data and/or system administrators and/or authorised to process, will receive relevant training from the Owner.

The University can also share personal data it owns with other public bodies should they process the same data for their own official purposes as well as to all those public bodies who are obliged to receive it in accordance with EU norms, law and regulations and insurance companies in cases of injury.

The management and storage of personal data that the University collects is kept on servers on University premises as well as contract suppliers' servers that provide services necessary for managing technical-administrative aspects where they could come across users' personal data through routine work. These suppliers are called "Processing officers" as in Art. 28 of GDPR.

The data can be shared with the following categories of recipients:

- 1) Ministry of Education, University and Research – MIUR
- 2) National Registry of students and graduates;
- 3) Ministry of Foreign Affairs, Embassies, Prefectures, Police headquarters, as in recognition of their status;
- 4) Public Prosecutor, Legal Council of State for managing disputes and disciplinary procedures;
- 5) Certifying administrations, to control alternative declarations under D.P.R. No.445/200;



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- 6) Other Italian and foreign universities, during transfer to and from other universities;
- 7) Foreign universities for student mobility programmes;
- 8) Public and private bodies that manage payment of contributions for research and/or scholarships or that promote studies and research, projects for university development;
- 9) Regional body for the Right to University Study (Piedmont) that manages the services for the right to study (scholarships, accommodation, canteen);
- 10) Intesa Sanpaolo – is the University's chosen bank that manages procedures of receiving fees, university contributions and payment of scholarships;
- 11) Consorzio Interuniversitario per il Calcolo Automatico – CINECA, for application procedures (including applications for admission to courses and admission tests, applications for prizes and scholarships, national exams, Masters, Specialisation courses, training courses and vocational training), management and maintenance for student advancement.
- 12) Other private, external resources for support in managing application tests and exams as in previous point.
- 13) Consorzio Interuniversitario Alma Laurea, for surveys into graduate profiles and work status
- 14) Insurance companies for injury claims, civil liabilities;
- 15) External public or private organisations for work, cultural, recreational and sports purposes;
- 16) Specific health organisations for courses and study that require access to health centres and hospitals.

### **e) Transferring data to a third country**

Once collected, the data could be transferred to a non-EU country (Third Country), as part of the University's obligations and interests. The Owner guarantees that the non-EU transfer will only be towards third countries that the European Commission (Art.45 GDPR) has deliberated as adequate or towards third countries that provide a guarantee recognised as adequate as in Art.46 del GDPR. (For example, adequate measures of guarantees have been adopted for Google services in the Educational sector; see Google's Privacy and Security section for more information which is available on the University website. Such services imply transferring personal data to a non-EU country, eg Google's "in cloud").

### **f) Data storage duration**

Personal data concerning university records (eg name, date of birth, etc, qualifications, mid-degree course exam assessment, final exam, rankings, reports etc) will be stored without limits in order to comply with requests for individual certificates and requests for checks and as part of University obligations to archive this information in accordance with current law.

Contact information (telephone, personal email) are stored for a period necessary to fulfil the purposes for which it was collected and later will no longer be used by the University.

### **g) Data rights**

Users have the following rights under Arts.15, 16, 17, 18, and 21 of GDPR:



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1. rights of access to personal data and all the information in Art.15;
2. right to cancel incorrect or incomplete personal data (Art.16)
3. right to cancel (“right to be forgotten”, Art.17) personal data with the exception of those contents which the University needs to keep, see F) or the University has a legitimate interest in keeping it for purposes of public interest;
4. right to processing limitations (Art.18) ie the right to obtain processing limitation from the processing owner when one of the issues in Art.18 occurs, except concerning the need and obligation to process the data in order to provide the services on offer;
5. right to data portability (right can only be applied digitally), (Art. 20);
6. right to oppose processing of personal data that concerns students (Art. 21) including profiling.

We should point out that the right to oppose cannot be taken into consideration where the University is legally obliged to process the data or it is in the public interest or related to its status as public authority.

Please write to the address below for more information:

**istanze.didattica@unito.it.**

### **h) Complaints**

Should the University not comply with the users’ demands under Art.77 of GDPR, it is possible to lodge a complaint to the Controlling Authority (personal data Watchdog protection via email: [garante@gdpd.it](mailto:garante@gdpd.it) (www.garanteprivacy.it) or report the University under Art.78 del GDPR.

### **j) Providing data**

Users are obliged to provide their data. Failure to do so will prevent the user from completing the procedure or accessing the service.

### **k) Different purposes for data processing**

Should the Owner intend to process the data for purposes different to why it had been originally collected, they should provide adequate information concerning the different purposes and any other pertinent information.

### **l) Profiling**

The owner does not use automated profiling processes.