






# UNIVERSITÀ DI PARMA

## PRIVACY POLICY - STUDENTS





Information document pursuant to and for the purposes of Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR)

	<p><b>1. DATA CONTROLLER AND CONTACTS</b></p> <p>The Data Controller is the <b>University of Parma</b>, with registered office in via Università 12, 43121 Parma (PR), Italy, in the person of the Rector, its pro-tempore Legal Representative, who may be contacted for any information by: telephone: +39 0521 902111, e-mail: <a href="mailto:protocollo@unipr.it">protocollo@unipr.it</a>, pec: <a href="mailto:protocollo@pec.unipr.it">protocollo@pec.unipr.it</a></p>
	<p><b>DATA PROTECTION OFFICER AND CONTACTS</b></p> <p>The <b>University of Parma</b> has appointed its own Data Protection Officer (DPO) pursuant to Articles 37, 38 and 39 of the GDPR. The DPO can be contacted at the Controller's offices indicated above and by e-mail by writing to: e-mail: <a href="mailto:dpo@unipr.it">dpo@unipr.it</a>, pec: <a href="mailto:dpo@pec.unipr.it">dpo@pec.unipr.it</a></p>
	<p><b>2. MAIN DEFINITIONS AND DATA</b></p> <p>Please note that Article 4 of the GDPR provides the following definitions:</p> <ul style="list-style-type: none"> <li>- <b>Personal data shall mean</b> any information relating to an identified or identifiable natural person ('<b>data subject</b>'); an identifiable person is one who can be identified, directly or indirectly, by reference in particular to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity.</li> <li>- <b>Special data</b> (see Art. 9 GDPR): personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data relating to a person's health or sex life or sexual orientation.</li> <li>- <b>Data relating to criminal convictions and offences or related security measures</b> (cf. Art. 10 GDPR): personal data disclosing measures referred to in Article 3(1)(a) to (o) and (r) to (u) of the Presidential Decree No 313 of 14 November 2002 on criminal records, the register of offence-related administrative penalties and related pending charges, or the status of defendant or suspect pursuant to Articles 60 and 61 of the Code of Criminal Procedure.</li> </ul> <p>It is specified that the holder will process:</p> <ul style="list-style-type: none"> <li>• <b>Personal data</b>, such as: identification data, contact data, career and study history data, family and financial situation data (information contained in the DSU and ISEEU), image taken (photo and/or video) and audio, if any;</li> <li>• <b>Particular data</b> such as data revealing racial and ethnic origin (for non-EU citizens, and for refugee status), a state of physical and mental health (in the case of pregnancy or for students with disabilities), sexual life (for possible changes of sex), the health condition or disability of certain members of the household (in the case of a request for exemption or reduction of fees for special cases provided for by law);</li> <li>• <b>Judicial data</b> such as data on detained students and users.</li> </ul>



# UNIVERSITÀ DI PARMA

## 3. PURPOSE OF PROCESSING, LEGAL BASIS, PERIOD OF STORAGE, NATURE OF PROVISION OF DATA, SOURCE OF DATA

	 PURPOSE OF PROCESSING	 LEGAL BASIS	 DATA RETENTION PERIOD	 NATURE OF PROVISION / SOURCE OF DATA
A)	<p><b>Degree enrolment and course management.</b></p> <ul style="list-style-type: none"> <li>management of the enrolment process, starting with the delivery of the entrance test and the preliminary verification of entry requirements;</li> <li>processing of the contribution bracket proportional to income, calculation of the amount of fees due, management of any paperwork relating to applications for exemption from payment of university fees, registration for calls for applications or requests for other services and/or interventions for the right to university study, such as the granting of benefits and/or any facilities provided by law;</li> <li>university career management and related activities (management of study plans, enrolment and attendance of university courses, registration of examinations, use of telematic, e-mail and library services, sending of communications relating to one's university career, provision of tutoring services, assistance and social inclusion);</li> <li>election of student representatives and the performance of tasks that may be inherent to the elected office held in the governing bodies of the University;</li> <li>activities preparatory to and related to the awarding of the degree (application for graduation and/or career suspension, verification of the authenticity of the assignments/dissertations prepared by undergraduates, conduct of the discussion, awarding of the title and related legal formalities).</li> </ul>	<p>Art. 6, paras. 1(e), 3, (b) and 9(2)(g) of the GDPR and Articles 2-ter and 2-sexies of the Privacy Code: performance of a task of public interest in the field of university education and training.</p> <p>Article 30 (Exemption from school and university fees) of Law 118/71</p>	<p>The data collected will be recorded, processed and stored in perpetuity should the student complete the enrolment process at the University, pursuant to Article 1 of Ministerial Decree of 30 May 2001 (G.U. 175 of 30 July 2001) 'Identification of essential data on student careers'. If the student does not complete the enrolment process, however, they will be retained for five years, in accordance with current regulations on document retention.</p>	<p>The conferment is necessary in order to perform a task of public interest for the University. If it is not conferred, the University will not be able to finalise the enrolment process.</p> <p>For the purpose of calculating the amount of fees due, in order to apply fee reductions, the University of Parma must acquire the ISEEU value, the composition and characteristics of the family nucleus, as well as all the information provided by you in the DSU, provided that relevant and not excessive for the same purpose, directly from the INPS database pursuant to the Prime Minister's Decree of 5 December 2013, n. 159.</p>
B)	<p>Fulfilments required for the <b>management of the educational and administrative relationship</b> between the University and the students.</p> <p>This includes the processing of special data, relating to persons with DSA, or judicial data relating to detained persons.</p>	<p>Art. 6(1)(e) of the Regulation. Art. 9(2)(g) GDPR - processing necessary for reasons of substantial public interest Art. 2-sexies par. 2 lit. bb) of the Code Privacy relevant public interest in education and training in</p>	<p>The data collected will follow the deadlines for enrolment at the University, pursuant to Article 1 of the Ministerial Decree of 30 May 2001 (G.U. 175 of 30 July 2001) 'Identification of essential data on student careers'.</p>	<p>Conferment is compulsory. Failure to provide it will make it impossible for the holder to fulfil legal obligations.</p>



## UNIVERSITÀ DI PARMA

		<p>school, vocational, higher or university environment.</p> <p>Art.2-ter of the Privacy Code :</p> <p>Art. 2 Law of 8 October 2010, No. 170 standards on DSA.</p> <p>Law of 5 February 1992, no. 104, Framework law for assistance, social integration and the rights of disabled persons.</p> <p>Art. 10 GDPR and Art. 2 octies of the Privacy Code</p> <p>Art. 19 Law of 26 July 1975, No. 354, Right to Education in the Prison Order.</p>		
C)	<p><b>Procedures relating to the regularity of profit examinations and of a disciplinary nature</b>, as laid down in the University's 'Regulations for disciplinary proceedings against students'.</p>	<p>Art. 6(1)(c) GDPR. Art. 16 of RDL 1071/1935.</p>	<ul style="list-style-type: none"> <li>• Unlimited, for the final measure;</li> <li>• 5 years for revoked or annulled measures.</li> </ul>	<p>Conferment is compulsory.</p> <p>Failure to provide it will make it impossible for the holder to fulfil legal obligations.</p>
D)	<p>Curricular and extracurricular <b>internship</b> and <b>job placement activities</b>.</p>	<p>Art. 6, paras. 1(e), 3, (b) and 9(2)(g) of the GDPR and Articles 2-ter and 2-sexies of the Privacy Code:</p> <p>performance of a task of public interest in the field of university education and training.</p>	<p>The data collected will follow the deadlines for enrolment at the University, pursuant to Article 1 of the Ministerial Decree of 30 May 2001 (G.U. 175 of 30 July 2001) 'Identification of essential data on student careers'.</p>	<p>Provision is necessary for the use of employment support services.</p> <p>In the event of failure to do so, the student will not be admitted to the traineeships.</p>
E)	<p><b>University orientation activities</b> to encourage accompanying and monitoring actions to prevent school drop-out (e.g. registration for orientation events, participation in individual orientation interviews).</p>	<p>The 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 (Art. 6(1)(e) GDPR).</p>	<p>The data may be archived and retained for a maximum period of 10 years assessed on the basis of the maximum duration of the university course of the individual concerned.</p>	<p>The provision of data is necessary for the performance of a task in the public interest or in connection with the exercise of public authority. Failure to provide personal data will result in the impossibility of performing a task of public interest or in connection with the exercise of public powers.</p> <p>the exercise of public</p>



## UNIVERSITÀ DI PARMA

				powers
F)	<b>Communication activities with students,</b> institutional information and community development, sending notifications to interested parties for orientation initiatives or new courses, sending proposals for participation in research projects.	The 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 (Art. 6(1)(e) GDPR).	Until the period of validity of the institutional mailbox for which the communications are intended	The provision of data is necessary for the performance of a task in the public interest or in connection with the exercise of public authority. Failure to provide personal data makes it impossible to perform a task of public interest or connected with the exercise of public authority powers
G)	<b>Communication activities through the collection and processing of images (photos) and audio-visual footage of students,</b> the creation of institutional campaigns, editorial initiatives concerning the presentation of the University itself and its educational offerings, for publications both in hard copy and on the institutional website, also of a historical nature, in the institutional social channels (Facebook, Twitter, Instagram, YouTube, etc.) and in all the University's official communication channels. This purpose therefore entails the dissemination of the data of the persons concerned on the above-mentioned platforms.	Art. 6(1)(a) of the GDPR. Consent.	Until your objection or revocation of consent.	The provision of data for this purpose is optional. In the event of failure to do so, the University will not be able to promote its educational offerings using the student's image.
H)	<b>Educational purposes concerning, e.g., the taking of audio-video images of classroom lectures</b> and their delivery in streaming and/or e-learning mode or for mere archival documentation. This purpose involves the collection of photo and audio-video images taken during classroom lessons.	Art. 6, paras. 1(e), 3, (b) and 9(2)(g) of the GDPR and Articles 2-ter and 2-sexies of the Privacy Code: performance of a task of public interest in the field of university education and training.	Images, photos and audio-video footage may be retained by the University for: <ul style="list-style-type: none"> <li>• 5 years (duration of Master's degree course) in the case of registration and uploading on e-learning platforms;</li> <li>• unlimited in the case of archive documentation aimed at achieving a historical record of institutional events and activities and for any historical publications, which will only concern special cases (e.g. lectures attended by public figures or speakers illustrated).</li> </ul>	This is necessary for the management of lessons delivered in online teaching mode, i.e. by streaming or uploading to e-learning. In the event of failure to do so, the University will not be able to make the content available to students at a later date by recording lectures.



# UNIVERSITÀ DI PARMA

I)	<b>Statistical surveys and evaluations within the University</b> , also carried out by means of questionnaires sent to students and/or graduates, in order to improve teaching activities, the services offered and/or student assistance.	The 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 (Art. 6(1)(e) GDPR).	Data is stored anonymously	The provision of data is necessary for the performance of a task in the public interest or in connection with the exercise of public authority. Failure to provide personal data makes it impossible to perform a task of public interest or connected with the exercise of public authority powers
M)	<b>Prevention and conduct of disputes and other legal aspects. Defence in case of litigation.</b>	The 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 (Art. 6(1)(e) GDPR).	Until the subsistence of the existing relationship and its expiry for the time necessary for the defence in court, unless opposed.	The provision of data is mandatory for the performance of a task in the public interest or in connection with the exercise of public authority. Failure to provide personal data makes it impossible to perform a task of public interest or connected with the exercise of public authority powers






#### 4. RECIPIENTS OF DATA

Personal data will be communicated to entities that will process the data as autonomous Data Controllers, or Data Processors (Art. 28 GDPR) and processed by natural persons (Art. 29 GDPR) acting under the authority of the Data Controller and Data Processors on the basis of specific instructions given regarding the purposes and methods of processing. The data will be communicated to recipients belonging to the following categories:

- lecturers, collaborators and University staff, internal subjects authorised to process data for the above-mentioned purposes;
- parties who finance the studies of the person concerned, including parties with parental responsibility (as referred to in Title IX of the Civil Code), who keep the person concerned in education through the balance of university instalments;
- persons who manage/support/assist, even only occasionally, the Controller in the administration of the Information System and telecommunications networks (including e-mail, websites and/or web platforms);
- in case of consent to the dissemination of images and photos/videos, photographers, communication and advertising agencies;
- social networks used by the University for institutional and communication purposes (see below);
- third parties such as private companies and organisations affiliated to the University, based in Italy or abroad (see below);
- public administrations or managers of public services if they have to process the data for any proceedings falling within their institutional competence, as well as all those public entities to which which, if the relevant conditions are met, communication is obligatory by




# UNIVERSITÀ DI PARMA

	<p>Community provisions, laws or regulations, as well as insurance companies for any accident cases;</p> <ul style="list-style-type: none"> <li>• other universities/schools abroad, upon request, in the case of study programmes with international mobility and transfers if they have to process the data for any proceedings within their own institutional competence;</li> <li>• public entities managing the provision of research grants and/or scholarships or promoting studies and research, projects for university development, services for the right to study;</li> <li>• the Ministry of Universities and Research (MUR), the Regional Body for the Right to Study (ER.GO), the AlmaLaurea Inter-University Consortium, the University Hospital of Parma, the Treasurer;</li> <li>• Competent authorities for the fulfilment of legal obligations and/or provisions of public bodies, upon request.</li> </ul> <p>The list of Article 28 Data Processors is available by writing to <a href="mailto:protocollo@unipr.it">protocollo@unipr.it</a> or to the other addresses given above.</p>
	<p><b>5. TRANSFER OF DATA TO COUNTRIES OUTSIDE THE EEA</b></p> <p>The data collected will be transferred outside the European Economic Area (EEA) in the event of:</p> <ul style="list-style-type: none"> <li>• internships or job placements with non-EU organisations/companies;</li> <li>• other universities abroad, upon request, in the case of study programmes with international mobility (e.g. Erasmus);</li> <li>• Authorities abroad, upon request, in cases where the qualification needs to be verified for professional reasons or to continue studies.</li> </ul> <p>Furthermore, the transfer outside the European Economic Area (EEA) will take place if the data subject gives consent to the dissemination of his/her audio/video image on the University's social platforms. In this case, the transfer will take place under the conditions provided for by these platforms, such as:</p> <ul style="list-style-type: none"> <li>• Facebook: <a href="https://www.facebook.com/privacy/policy/">https://www.facebook.com/privacy/policy/</a></li> <li>• Instagram: <a href="https://privacycenter.instagram.com/policy">https://privacycenter.instagram.com/policy</a></li> </ul> <p>etc.</p> <p>The Data Controller assures as of now that such non-EU transfer will only take place to third countries in respect of which there is an adequacy decision of the European Commission (Art. 45 GDPR) or to third countries that provide one of the guarantees indicated as adequate by Art. 46 of the GDPR, or, in exceptional cases, on the basis of the exceptions pursuant to Art. 49(1) of the GDPR.</p> <p>For information on the guarantees inherent in the transfer of data outside the EEA, interested parties may write to <a href="mailto:protocollo@unipr.it">protocollo@unipr.it</a>.</p>
	<p><b>6. AUTOMATED PROCESSES</b></p> <p>Personal data will be subject to traditional manual, electronic and automated processing. Please note that no fully automated decision-making processes are carried out.</p>
	<p><b>7. RIGHTS OF THE PERSONS CONCERNED</b></p> <p>Data subjects may assert their rights as expressed in Art. 15 et seq. GDPR, by contacting the DPO/RPD at the e-mail address: <a href="mailto:dpo@unipr.it">dpo@unipr.it</a> or by contacting the Data Controller at the e-mail address: <a href="mailto:protocollo@unipr.it">protocollo@unipr.it</a>, or by writing to the above-mentioned contacts.</p> <p>The data controller guarantees data subjects the possibility of requesting, at any time, access to their personal data (Art. 15), rectification (Art. 16), erasure (Art. 17) and restriction of processing (Art. 18). The data controller shall inform (Art. 19), to each of the recipients to whom the personal data have been transmitted, of any rectification or erasure or restriction of processing carried out. The data controller shall inform those recipients who so request.</p> <p>In the cases provided for by the GDPR (Art. 20), the holder guarantees the right to portability and, in the case of requests to the</p>



# UNIVERSITÀ DI PARMA

	<p>Pursuant to Art. 20, the data controller will provide data subjects with the data in a structured, commonly used and machine-readable format. In the cases provided for by the GDPR (art.21), it is recognised that data subjects have the right to object, at any time, to the processing of their data for the performance of a task in the public interest, by writing to the contacts above with the subject "objection" and, in cases where the legal basis is consent, it is recognised that data subjects have the right to withdraw the consent given, without prejudice to the lawfulness of the processing based on the consent given prior to the revocation.</p> <p>In the event that data subjects consider that the processing of personal data carried out by the Controller is in breach of the provisions of Regulation (EU) 2016/679, they are free to lodge a complaint with the Supervisory Authority, in particular in the Member State in which they habitually reside or work, or in the place where the alleged breach of the Regulation occurred (Garante Privacy <a href="https://www.garanteprivacy.it/">https://www.garanteprivacy.it/</a>), or to take appropriate legal action.</p>
	<p><b>8. INFORMATION CHANGES</b></p> <p>The holder may change, amend, add or remove any part of this Policy. In order to facilitate the verification of any changes, the Policy will contain an indication of the date on which the Policy was updated.</p>

Date of update: AUGUST 2024

**The Data Controller**

\_\_\_\_\_  
**University of Parma**



# UNIVERSITÀ DI PARMA

## DECLARATION OF ACKNOWLEDGEMENT

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### CONSENT TO THE PROCESSING OF PERSONAL DATA

for communication activities through the collection and processing of images (photos) and audio-video footage

I, the undersigned \_\_\_\_\_ declares that he/she has received the above information pursuant to Art. 13 GDPR and

Consent

Does not agree

the processing of personal data for the purpose of carrying out "*Communication activities through the collection and processing of images (photos) and audio-video recordings of students*" - purpose G) of the information notice.

Place, date \_\_\_\_\_, \_\_\_\_/\_\_\_\_/\_\_\_\_\_

Signature \_\_\_\_\_

### COPYRIGHT CLEARANCE

Furthermore, I, the undersigned, in the event of consent to dissemination, GRANT FREE OF CHARGE the copyrights related to the pursuit of the purpose indicated in the information notice.

Taking into account and in accordance with Articles 10 of the Italian Civil Code and Articles 12, 96, 97 of Law 633/1941, the undersigned authorises the publication and/or dissemination in any form free of charge of his/her portrait/image, filming and audio/video recordings even in partial, modified or adapted form of his/her person, for purposes of dissemination, promotion and institutional communication. He/she authorises the publication of the data (images, photos, videos) granting free of charge the relative rights of use for all promotional and editorial uses in the unlimited buyout formula (by way of example, advertising in the press, television, posters, internet, social networks, btl material, videos, publications, etc.). It also prohibits their use in contexts that undermine personal dignity and decorum. The posing and use of the images are to be considered free of charge.

Date \_\_\_\_/\_\_\_\_/\_\_\_\_\_

Signature for copyright release \_\_\_\_\_