



# UNIVERSITÀ DI PARMA

## PRIVACY POLICY – Data processing in a research project Information document pursuant to and for the purposes of Article 13 of Regulation (EU) 2016/679 (GDPR)

You are invited to take part in a study that aims to *[indicate the objective of the research]* conducted in *[indicate Department/Organisational Unit]*, in collaboration with *[indicate, if any, any entities or third parties collaborating in the research]*. The characteristics of the study and how it will be conducted are described in detail in the document "*Informed consent to participate in research - adults/minors*".

In accordance with the above-mentioned legislation, the processing of your personal data by the authorised parties involved in the study will be based on compliance with the principles set out in Article 5 of the GDPR and, in particular, those of lawfulness, fairness, transparency, relevance, non-excessiveness and in such a way as to ensure adequate security of personal data.

	<b>1. DATA CONTROLLER AND CONTACTS</b> The Data Controller is <b>the 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 can be contacted for any information by telephone: +39 0521 902111, e-mail: <a href="mailto:protocollo@unipr.it">protocollo@unipr.it</a> , certified e-mail: <a href="mailto:protocollo@pec.unipr.it">protocollo@pec.unipr.it</a>
	<b>DATA PROTECTION OFFICER AND CONTACTS</b> <b>The University of Parma</b> has appointed its own Data Protection Officer (DPO) in accordance with Articles 37, 38 and 39 of the GDPR. The DPO can be contacted at the Data Controller's headquarters indicated above and by email at: email: <a href="mailto:dpo@unipr.it">dpo@unipr.it</a> , certified email: <a href="mailto:dpo@pec.unipr.it">dpo@pec.unipr.it</a>
	<b>RESEARCH MANAGER</b> The Research Manager is <i>[indicate the details of the Manager]</i> , domiciled for this role at the headquarters <i>[indicate the headquarters]</i> .
	<b>2. MAIN DEFINITIONS AND DATA PROCESSED</b> Please note that Article 4 of the GDPR provides the following definitions: <ul style="list-style-type: none"> <li>- <b>Personal data</b>: any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.</li> <li>- <b>Special categories of data</b> (see Article 9 of the GDPR): personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, as well as genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.</li> <li>- <b>Data relating to criminal convictions and offences or related security measures</b> (see Article 10 of the GDPR): personal data revealing measures referred to in Article 3, paragraph 1, letters a) to o) and r) to u) of Presidential Decree No. 313 of 14 November 2002, No. 313, concerning criminal records, the register of administrative penalties for offences 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><i>[indicate the types of data processed]</i></p> <p>The following types of data will be processed: <i>[list only those relevant]</i></p> <ul style="list-style-type: none"> <li>• personal data</li> </ul>



- contact details
- data relating to the person's health or sex life or sexual orientation
- biometric data
- judicial data
- data relating to trade union membership
- data revealing racial or ethnic origin
- data revealing religious or philosophical beliefs or political opinions
- images, audio, video
- genetic data
- other types of data: (specify)

#### METHOD OF PROCESSING

[to be integrated and customised according to the processing carried out]

The personal data collected will be processed using [paper, electronic] tools

**Example:** The researchers conducting the study will identify the data subject with a code. The data collected during the study will be recorded, processed and stored for x years together with this code [indicate the storage period, which must in any case be commensurate with the purposes of the collection]. Only the researcher and authorised persons will be able to link this code to your name

[only if the data is subject to profiling]

The personal data collected will be subject to **profiling processes**, understood as "Any form of automated processing of personal data consisting of the use of such data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning professional performance, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements."

Such processing will only be carried out with the specific, free, informed and unambiguous consent of the data subject, in accordance with Articles 6(1)(a) and 22 of Regulation (EU) 2016/679 (GDPR). The data subject may withdraw consent at any time, without prejudice to the lawfulness of processing based on consent prior to withdrawal.

[only if Artificial Intelligence systems are used]





The personal data collected will also be processed using **Artificial Intelligence (AI) systems** for the purposes of [analysis, modelling, classification or automatic processing of data...], in line with the objectives of the research project.


Such processing shall be carried out in accordance with the principles of lawfulness, fairness, transparency, minimisation, integrity and confidentiality, as provided for in Regulation (EU) 2016/679 (GDPR). The use of AI is limited to the stated purposes and does not involve fully automated decisions that produce legal effects or significantly affect the data subject, except in cases where this is explicitly provided for and in compliance with the safeguards set out in Article 22 of the GDPR.

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



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 <b>PURPOSE OF THE PROCESSING</b>	 <b>LEGAL BASIS</b>	 <b>RETENTION PERIOD DATA</b>	 <b>NATURE OF THE PROVISION / SOURCE OF THE DATA</b>
<p>The data you provide will be processed for research purposes <i>[indicate the type of research]</i>.</p>	<p>The processing of your personal data is carried out by the Data Controller in the performance of its tasks in the public interest pursuant to Article 6(1)(e) of the GDPR.</p> <p><i>[to be included only in the case of processing of special categories of data]</i></p> <p>The processing of special categories of personal data (sensitive data) requires explicit consent pursuant to Article 6, paragraph 1, letter a) of the GDPR.</p>	<p>The data will be stored for a period of <i>[specify months/years]</i> after the conclusion of the Study, which is expected to end after <i>[specify years]</i>.</p>	<p>Although provision of data is optional, it is necessary for the aforementioned research purposes, essential for the conduct of the Study and does not arise from a regulatory obligation. Failure to provide data will make it impossible to participate in the Study.</p>

	<p><b>4. DATA RECIPIENTS</b></p> <p><i>[indicate the subjects to whom the data will be communicated]</i></p> <p><i>Example:</i> The specific data will be collected by <i>[indicate organisational unit]</i> and may be communicated for <i>[indicate the activities/purposes pursued by the other centres within the scope of the study referred to above]</i> to [...] and to external persons or companies acting on their behalf, including <i>[insert the identification details of at least one of the third parties to whom the data will be transmitted]</i>. <i>[If it is essential to transfer the data outside the EU in order to achieve the purposes of the study, add "The data, identified exclusively by a numerical code, will also be transmitted to countries outside the European Union that do not guarantee an adequate level of personal data protection" [insert the identification details of the recipients].</i></p> <p><i>[indicate whether the personal data will be disclosed and in what manner]</i></p> <p><i>Example:</i> The data will only be disclosed in strictly anonymous form, for example through scientific publications, statistics and scientific conferences.</p>
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	<p>[to be included in the case of use of images/videos relating to the data subject and to be customised according to whether or not anonymisation is possible]</p> <p>If strictly necessary for research purposes, the processing may also concern images of the data subject (photographs, video recordings, audio-video recordings, X-rays).</p> <p>The processing of such images will be carried out in compliance with the provisions of the law, ensuring the anonymity of the Data Subject <i>in all cases where this is possible</i> by obscuring their physical features.</p> <p>[to be included only if the images/videos are subject to publication/dissemination]</p> <p>For the processing of images/videos, the data subject's consent and release form are required, also in accordance with the provisions of the law on image rights, considering that, even in special cases, images of persons whose faces have been obscured may still allow them to be identified.</p>
	<p><b>5. TRANSFER OF DATA TO COUNTRIES OUTSIDE THE EEA</b></p> <p>The Data Controller hereby guarantees that such transfers outside the EU will only take place to third countries for which the European Commission has issued an adequacy decision (Article 45 of the GDPR) or to third countries that provide one of the safeguards indicated as adequate in Article 46 of the GDPR, or, in exceptional cases, on the basis of the derogations pursuant to Article 49(1) of the GDPR.</p> <p>For information about the safeguards relating to the transfer of data outside the EEA, data subjects may write to <a href="mailto:protocollo@unipr.it">protocollo@unipr.it</a>.</p>
	<p><b>6. AUTOMATED PROCESSES</b></p> <p>[customise according to the processing carried out]</p> <p>Personal data will be processed manually, electronically and automatically. Please note that no fully automated decision-making processes are carried out.</p>
	<p><b>7. RIGHTS OF DATA SUBJECTS</b></p> <p>Data subjects may exercise their rights as set out in Articles 15 et seq. of the GDPR by contacting the DPO/RPD at the email address: <a href="mailto:dpo@unipr.it">dpo@unipr.it</a> or by contacting the Data Controller at the email address: <a href="mailto:protocollo@unipr.it">protocollo@unipr.it</a>, or by writing to the above contacts.</p> <p>The Data Controller guarantees data subjects the possibility to request, at any time, access to their personal data (Article 15), rectification (Article 16), erasure (Article 17) and restriction of processing (Article 18). The Data Controller shall communicate (Art. 19) to each of the recipients to whom the personal data have been transmitted any corrections, erasures or restrictions on processing that have been made. The Data Controller shall communicate such recipients to data subjects who so request. In the cases provided for by the GDPR (Art. 20), the data controller guarantees the right to portability and, in the event of requests pursuant to Art. 20, the data controller shall provide the data subjects with the data in a structured, commonly used and machine-readable format. In the cases provided for by the GDPR (Art. 21), data subjects have the right to object, at any time, to the processing of data for the performance of a task carried out in the public interest, by writing to the above contacts with the subject line 'objection'. and, in cases where the legal basis is consent, data subjects have the right to withdraw their consent, without prejudice to the lawfulness of the processing based on the consent given prior to the withdrawal.</p> <p>If data subjects believe that the processing of personal data by the Data Controller is in breach of Regulation (EU) 2016/679, they are free to lodge a complaint with the Supervisory Authority, in particular in the Member State where they habitually reside or work, or in the place where the alleged breach of the Regulation occurred (Privacy Guarantor <a href="https://www.garanteprivacy.it/">https://www.garanteprivacy.it/</a>), or to take appropriate legal action.</p>



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### 8. CHANGES TO THE POLICY

The data controller may change, modify, 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 of its update.

Date of update: **OCTOBER 2025**

The Data Controller  
**University of Parma**

\*Automatic Translation Notice: This form has been translated using artificial intelligence systems.

While every effort has been made to ensure maximum accuracy, if you notice any errors, please report them by writing to [dpo@unipr.it](mailto:dpo@unipr.it).



## CONSENTS

I consent to the processing of my data for the purposes described in this policy, within the limits and in the manner indicated therein.

- **Consent to the processing of special categories of data**

- ☐ I consent to the processing of special categories of personal data, where necessary for the research project.

*[To be included if profiling is carried out]*

- **Consent to profiling**

- ☐ I consent to the profiling of my personal data, understood as automated processing aimed at evaluating personal aspects (e.g. behaviour, preferences, interests), exclusively for scientific research purposes.

Name and surname of the data subject (in block capitals) \_\_\_\_\_

Born \_\_\_\_\_ on \_\_\_\_\_

Signature of the person concerned \_\_\_\_\_

Date \_\_\_\_\_



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### Release for the dissemination of images, audio and video – Scientific research purposes

I, the undersigned \_\_\_\_\_

born on \_\_\_\_\_ in \_\_\_\_\_

residing in \_\_\_\_\_

email \_\_\_\_\_

I **AUTHORISE** the University of Parma, as data controller, and its representatives, collaborators and agents, to:

- Take **photographs, audio and video recordings** that portray me, even partially or indirectly, in the context of activities related to the research project entitled: *[Project title]* and to use and **disseminate them** for **scientific, educational and informational** purposes through institutional channels (websites, social media, scientific publications, presentations, digital archives, etc.), in compliance with current legislation.

I declare that I have been informed that:

- This authorisation is **free of charge**, does not entail any financial rights and may be **revoked at any time** by writing to: [email address of the data controller or DPO].

Date: \_\_\_\_\_

Signature: \_\_\_\_\_