UNIVERSITÀ DI PARMA

I PRIVACY NOTICE – STUDENTS

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



1. DATA CONTROLLER AND CONTACT DETAILS

The Data Controller is the University of Parma, with its registered office at 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 via: telephone: +39 0521 902111, email: protocollo@unipr.it, certified email: protocollo@pec.unipr.it



DATA PROTECTION OFFICER AND CONTACT DETAILS

The University of Parma has appointed its 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 registered office indicated above and by email at: email: dpo@unipr.it, certified email: dpo@pec.unipr.it



2. KEY DEFINITIONS AND DATA PROCESSED

Please note that Article 4 of the GDPR provides the following definitions:

- **Personal data**: 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.
- **Special categories of data** (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 intended to uniquely identify a natural person, and data concerning a person's health, sex life or sexual orientation.
- **Data relating to criminal convictions and offences or related security measures** (see Article 10 of the GDPR): personal data revealing measures referred to in Article 3(1)(a) to (o) and (r) to (u) of the Presidential Decree No. 313 of 14 November 2002, concerning the criminal record, the register of administrative sanctions arising from criminal offences and related pending proceedings, or the status of a defendant or person under investigation pursuant to Articles 60 and 61 of the Code of Criminal Procedure.

It is specified that the data controller will process:

· **Personal data**, such as identification data, personal details, contact details, career and educational history, data relating to family and financial circumstances (information contained in the DSU and ISEEU), recorded images (photographs and/or videos) and any audio;

· **Special categories of data**, such as data revealing racial or ethnic origin (for non-EU citizens and for refugee status), physical and mental health (in the case of pregnancy or for students with disabilities), sexual life (in the case of gender reassignment), and the health or disability status of certain family members (in the event of an application for exemption from or reduction of fees for special cases provided for by law);

· **Criminal records**, such as data relating to students who are prisoners and service users.

3. PURPOSES OF PROCESSING, LEGAL BASIS, RETENTION PERIOD, NATURE OF PROVISION, SOURCE OF DATA

	PURPOSES OF PROCESSING	LEGAL BASIS	DATA RETENTION PERIOD	NATURE OF DATA PROVISION / SOURCE OF DATA
A)	**Enrolment on degree programmes and management of the course of study.** • management of the enrolment process, starting with the administration of the entrance test and the preliminary verification of admission requirements; • determination of the income-based fee bracket, calculation of the amount of fees due, handling of any applications for exemption from university fees, registration for calls for applications or requests for other services and/or support under the right to university education, such as the granting of benefits and/or any concessions provided for by law; • management of students' academic careers and related activities (management of study plans, enrolment in and attendance at university courses, registration for examinations, use of online services, email and library services, sending of communications relating to students' academic careers, provision of tutoring, support and social inclusion services); • the election of student representatives and the performance of any duties relating to the elected office held within the University's governing bodies; • activities preparatory to and related to the award of a degree (application for a degree and/or suspension of studies, verification of the authenticity of assignments/theses prepared by final-year students, conducting the defence, awarding the degree and related legal obligations).	Article 6(1)(e), (3), (b) and 9(2)(g) of the GDPR and Articles 2-ter and 2-sexies of the Privacy Code: the performance of a task in the public interest in the field of education and training within the university context. Article 30 (Exemption from school and university fees) of Law 118/71.	The data collected will be recorded, processed and stored indefinitely should the student complete the enrolment process at the University, in accordance with Article 1 of the Ministerial ecree of 30 May 2001 (Official Gazette No. 175 of 30 July 2001) "Identification of essential data on students' academic careers". If, however, the student does not complete the enrolment process, the data will be retained for 5 years, in accordance with current regulations governing document retention policies.	The provision of this information is necessary for the performance of a task in the public interest on behalf of the University. Should this information not be provided, the University will be unable to complete the enrolment process. For the purposes of processing the calculation of the amounts of fees due, and to apply concessions to the amounts of fees, the University of Parma will need to obtain the ISEEU value, the composition and characteristics of the household, as well as all the information you have provided in the DSU, provided that it is relevant and does not exceed what is necessary for that specific purpose, directly from the INPS database in accordance with the Prime Ministerial Decree of 5 December 2013, No. 159.

B)	Requirements necessary for the **management of the academic and administrative relationship** between the University and its students. This includes the processing of special categories of data relating to individuals with learning difficulties, or of criminal records relating to prisoners.	Article 6(1)(e) of the Regulation. Article 9(2)(g) of the GDPR – processing necessary for reasons of substantial public interest; Article 2-sexies(2)(bb) of the Privacy Code – substantial public interest in the field of education and training in school, vocational, higher or university settings. Article 2-ter of the Privacy Code: Article 2 of Law No. 170 of 8 October 2010, provisions concerning Specific Learning Difficulties (SLD). Law No. 104 of 5 February 1992, Framework Law on assistance, social integration and the rights of persons with disabilities. Article 10 of the GDPR and Article 2-octies of the Privacy Code. Article 19 of Law No. 354 of 26 July 1975, Right to education within the prison system.	The data collected will comply with the provisions relating to enrolment at the University, in accordance with Article 1 of the Ministerial Decree of 30 May 2001 (Official Gazette No. 175 of 30 July 2001) 'Identification of essential data on students' academic careers'.	The provision of personal data is mandatory. Failure to provide such data will make it impossible for the data controller to comply with legal obligations.

C)	**Procedures relating to the validity of examination papers and disciplinary matters,** as set out in the University's specific 'Regulations on disciplinary proceedings against students'.	Article 6(1)(c) of the GDPR. Article 16 of Royal Decree-Law No. 1071/1935.	- Indefinite, for the final order; - 5 years for orders that have been revoked or set aside.	The provision of personal data is mandatory. Failure to provide such data will make it impossible for the data controller to comply with legal obligations.
D)	**Work placements –** both as part of the curriculum and outside it – and job placement.	Article 6(1)(e), (3)(b) and (9)(2)(g) of the GDPR and Articles 2-ter and 2-sexies of the Privacy Code: the performance of a task carried out in the public interest in the field of university education and training.	The data collected will comply with the provisions relating to enrolment at the University, in accordance with Article 1 of the Ministerial Decree of 30 May 2001 (Official Gazette No. 175 of 30 July 2001) 'Identification of essential data on students' academic careers'.	Providing this information is necessary in order to access services supporting entry into the world of work. If this information is not provided, the student will not be admitted to work placements.
E)	**University guidance activities** designed to facilitate support and monitoring measures to prevent early school leaving (e.g. enrolment in guidance events, participation in individual guidance interviews).	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 data controller (Article 6(1)(e) of the GDPR).	Data may be stored and retained for a maximum period of 10 years, calculated on the basis of the maximum duration of the university course for the individual concerned.	The provision of data is necessary for the performance of a task carried out in the public interest or in connection with the exercise of official authority. Failure to provide personal data will make it impossible to carry out a task in the public interest or in connection with the exercise of official authority.

F)	**Communication with students,** institutional information and community development, sending notifications to interested parties regarding careers guidance initiatives or new courses, and sending invitations to take part 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 data controller (Article 6(1)(e) of the GDPR).	For as long as the institutional email account to which the communications are addressed remains active.	The provision of data is necessary for the performance of a task carried out in the public interest or in connection with the exercise of official authority. Failure to provide personal data will make it impossible to carry out a task in the public interest or in connection with the exercise of official authority.
G)	**Communication activities involving the collection and processing of images (photographs) and audio-visual recordings of students**, the organisation of institutional campaigns and publishing initiatives relating to the presentation of the University itself and its academic programmes, for both printed publications and the institutional website – including those of a historical nature – on the University's official social media channels (Facebook, Twitter, Instagram, YouTube, etc.) and across all the University's official communication channels. This purpose therefore involves the dissemination of data subjects' personal data on the platforms listed above.	Article 6(1)(a) of the GDPR. Consent.	Until you object or withdraw your consent.	The provision of data for this purpose is optional. Should you choose not to provide such data, the University will be unable to promote its educational programmes using the student's image.
H)	Educational purposes relating, for example, to the recording of audio-visual footage of lessons in the classroom and the distribution of such material via streaming and/or e-learning platforms, or for the sole purpose of archival documentation. This purpose involves the collection of photographs and audio-visual recordings taken during classroom lessons.	Article 6(1)(e), (3)(b) and (9)(2)(g) of the GDPR and Articles 2-ter and 2-sexies of the Privacy Code: the performance of a task carried out in the public interest in the field of university education and training.	Images, photographs and audio-visual recordings may be retained by the University for: · 5 years (the duration of the Master's degree programme) in the case of recordings uploaded to e-learning platforms; · indefinitely in the case of archival documentation intended to preserve a historical record of events and institutional activities, and for any historical publications, which will only concern specific cases (e.g. lectures attended by public figures or distinguished speakers).	Consent is required for the management of lessons delivered via online teaching methods, i.e. via live streaming or by uploading content to the e-learning platform. Should consent not be given, the University will be unable to make the content available to students at a later date, even via recorded lessons.

I)	**Statistical surveys and internal university evaluations**, carried out in part through questionnaires sent to students and/or graduates, with a view to improving teaching, the services provided and/or student support.	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 data controller (Article 6(1)(e) of the GDPR).	The data is stored in anonymised form.	The provision of data is necessary for the performance of a task carried out in the public interest or in connection with the exercise of official authority. Failure to provide personal data will make it impossible to carry out a task in the public interest or in connection with the exercise of official authority.
M)	**Prevention and management of disputes and** other legal matters**. Defence in the event of litigation.**	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 data controller (Article 6(1)(e) of the GDPR).	For as long as the existing relationship remains in force and until its expiry, for the time necessary to mount a defence in court, unless an objection is raised.	The provision of data is mandatory for the performance of a task carried out in the public interest or in connection with the exercise of official authority. Failure to provide personal data will make it impossible to carry out a task in the public interest or in connection with the exercise of official authority.
N)	**Optional monitoring of interactions with the University's electronic communications,** using tracking pixels or equivalent technologies, to record when messages are opened and/or links are clicked by individual recipients, with a view to assessing the effectiveness of the communications and improving their content and delivery methods. This monitoring is separate from the sending of the communications.	Data processing is carried out only with the data subject's free, specific and informed consent, in accordance with Article 6(1)(a) of the GDPR.	Personal data relating to opens and clicks attributable to individual recipients is retained for 24 months and subsequently deleted or anonymised.	Consent is optional. Failure to give consent or the withdrawal of consent does not affect the receipt of communications or access to services. Data is collected through interaction with messages. The procedures for giving and withdrawing consent are set out in the specific information on tracking, which is made available before tracking is activated.

4. RECIPIENTS OF THE DATA

Personal data will be disclosed to parties who will process the data in their capacity as independent data controllers or data processors (Article 28 of the GDPR) and processed by natural persons (Article 29 of the GDPR) acting under the authority of the data controller and data processors on the basis of specific instructions provided regarding the purposes and methods of processing. The data will be disclosed to recipients falling within the following categories:

· academic staff, collaborators and University personnel, i.e. internal parties authorised to process data for the purposes set out above;

· parties who fund the data subject's studies, including those with parental responsibility (as referred to in Title IX of the Civil Code), who support the data subject's studies by paying their University fees;

· persons who manage, support or assist, even only occasionally, the Data Controller in the administration of the Information System and telecommunications networks (including email, websites and/or web platforms);

· in the event of consent to the dissemination of images and photos/videos, photographers, communications and advertising agencies;

· social media platforms used by the University for institutional and communication purposes (see below);

· third parties such as private companies and organisations with agreements with the University, based in Italy or abroad (see below);

· public administrations or public service providers where they need to process data for any procedures falling within their institutional remit, as well as all those public bodies to which, where the relevant conditions are met, disclosure is mandatory under EU provisions, laws or regulations, in addition to insurance companies for any accident claims;

· other universities/colleges abroad, upon request, in the case of study programmes involving international mobility and transfers, where they need to process the data for any procedures falling within their institutional remit;

· public bodies that administer the provision of research grants and/or scholarships, or that promote studies and research, university development projects, and services relating to the right to education;

· the Ministry of Universities and Research (MUR), the Regional Authority for the Right to Education (ER.GO), the AlmaLaurea Inter-University Consortium, the Parma University Hospital Trust, and the Treasury Department;

· competent authorities for the fulfilment of legal obligations and/or provisions issued by public bodies, upon request.

The list of Data Processors pursuant to Article 28 is available by writing to protocollo@unipr.it or via the other contact details provided above.

5. TRANSFER OF DATA TO COUNTRIES OUTSIDE THE EEA

The data collected will be transferred outside the European Economic Area (EEA) in the following cases:
· work placements or internships with organisations or companies outside the EU;
· other universities abroad, upon request, in the case of study programmes involving international mobility (e.g. Erasmus);
· authorities abroad, upon request, where it is necessary to verify academic qualifications for professional reasons or for the purpose of continuing one's studies.

Furthermore, data will be transferred outside the European Economic Area (EEA) should the data subject give their consent to the publication of their audio/video image on the University's social media platforms. In such cases, the transfer will take place in accordance with the terms and conditions set out by those platforms, such as:

· Facebook: https://www.facebook.com/privacy/policy/
· Instagram: https://privacycenter.instagram.com/policy
etc.

The Data Controller hereby confirms that such transfers outside the EU will only take place to third countries for which there is an adequacy decision by the European Commission (Article 45 of the GDPR), or to third countries that provide one of the safeguards deemed adequate under Article 46 of the GDPR, or, in exceptional cases, on the basis of the derogations provided for in Article 49(1) of the GDPR. For information regarding the safeguards relating to the transfer of data outside the EEA, data subjects may write to protocollo@unipr.it.

6. AUTOMATED PROCESSES

Personal data will be processed manually, electronically and automatically. Please note that we do not carry out fully automated decision-making processes.

7. RIGHTS OF DATA SUBJECTS

Data subjects may exercise their rights as set out in Articles 15 et seq. of the GDPR by contacting the DPO at the following email address: dpo@unipr.it, or by contacting the Data Controller at the following email address: protocollo@unipr.it, or by writing to the contact details provided above.

The data controller guarantees that data subjects may, at any time, request access to their personal data (Article 15), rectification (Article 16), erasure (Article 17) and restriction of processing (Article 18). The data controller shall notify (Article 19) each recipient to whom personal data have been disclosed of any rectification, erasure or restriction of processing carried out. The data controller shall inform data subjects who so request of the identities of such recipients. In the cases provided for by the GDPR (Article 20), the data controller shall guarantee the right to data portability and, in the event of requests pursuant to Article 20, 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 (Article 21), data subjects are entitled 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 contact details set out above with the subject line 'objection' and, where the legal basis is consent, data subjects have the right to withdraw the consent they have given, without prejudice to the lawfulness of processing based on consent given prior to withdrawal.
Should data subjects consider that the processing of personal data carried out by the Data 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 (Data Protection Authority https://www.garanteprivacy.it/), or to bring the matter before the appropriate courts.

	**8. CHANGES TO THIS PRIVACY POLICY** The data controller may change, amend, add to or remove any part of this Privacy Policy. To make it easier for you to check for any changes, the Privacy Policy will state the date on which it was last updated.

Data di aggiornamento: **NOVEMBRE 2026**

Il Titolare del trattamento

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Università degli Studi di Parma

APPENDIX TO THE STUDENT PRIVACY NOTICE

Processing of personal data using tracking tools in emails relating to placement services

Supplementary information pursuant to Articles 12 and 13 of Regulation (EU) 2016/679 (GDPR) and Article 122 of Legislative Decree 196/2003.

This appendix supplements the University of Parma's Student Privacy Notice, with particular reference to work placement and career placement activities and to the institutional communications referred to in point 3, letters D) and F).

The following information relates exclusively to the possible use of tracking tools in emails sent via the AlmaLaurea platform's communication form for career guidance, placement and entry into the world of work.

1. Data Controller

The Data Controller is the University of Parma, with its registered office at Via Università 12, 43121 Parma (PR), in the person of the Rector, the pro tempore legal representative.

For information on the processing of personal data, please contact the University at protocollo@unipr.it.

The Data Protection Officer (DPO) can be contacted at dpo@unipr.it.

Further information regarding the Data Controller and the exercise of rights is set out in the general privacy notice.

2. What are tracking pixels?

Emails sent by the University of Parma via the AlmaLaurea platform's communication form may contain technological tools, known as *tracking pixels*, which enable the detection of when messages are opened.

A tracking pixel is a small image, generally transparent and invisible to the recipient, which is loaded from a server when the email programme displays the message and allows images to be downloaded.

This loading may make it possible to detect that the email has been opened.

Similarly, links contained in the messages may contain technical identifiers that make it possible to detect when the recipient clicks on them.

Any use of such tools takes place exclusively in accordance with the methods and for the purposes described in this appendix.

3. What personal data may be collected

Where the data subject has given consent to individual tracking, the following may be processed via the tools described above, depending on the features actually activated: Technical identifiers may

make it possible to associate the events of opening the message and clicking on links with a specific recipient, even when they do not directly contain the recipient's name or email address.

- the recipient's email address;
- whether the message has been opened;
- the date and time of opening;
- the number of times the message has been opened;

- the links selected within the message;
- the technical identifiers associated with the communication and the recipient;
- [any further technical data, such as IP address and information relating to the device or email programme, if actually collected by the platform].

Tracking tools do not allow the University to access the contents of the recipient's email inbox or other messages contained therein.

4. Purposes of processing and legal basis

The sending of communications relating to the University of Parma's institutional activities concerning career guidance, placement, initiatives involving meetings with businesses and employment opportunities falls within the institutional purposes of the University of Parma, in accordance with the provisions of the general student information notice.

These activities are distinct from any processing of personal data carried out using tracking tools.

Individual tracking of opens and clicks, where enabled, is intended to monitor recipients' interaction with the communications sent, to assess the effectiveness of information activities and to improve communication methods relating to placement services.

For these purposes, where the conditions allowing processing without consent do not apply, processing is carried out exclusively with the data subject's prior consent, in accordance with Article 122(1) of Legislative Decree 196/2003 and Article 6(1)(a) of the GDPR.

Data collected through individual tracking are not used for profiling purposes, to make automated decisions that produce legal or similarly significant effects on the data subject, nor to automatically adjust the frequency of communications based on individual behaviour.

5. Optional nature of consent

Consent to individual tracking is freely given and optional.

The data subject may continue to receive communications relating to placement services even without consenting to tracking.

Failure to give consent does not affect the use of the service nor does it limit the ability to receive information on initiatives and opportunities relating to career guidance and employment placement.

In the absence of consent, no individual tracking features for page views and clicks are activated for the purposes indicated above.

Any compilation of general statistics is carried out in accordance with applicable legislation and without the use of individual monitoring tools that require the data subject's consent.

6. How to give and withdraw consent

Consent to individual tracking may be given via the specific functions made available on the AlmaLaurea platform.

The data subject may change their preferences or withdraw their consent at any time via the **'Tracking Management'** function, accessible via the link provided in the communications received.

Withdrawal of consent does not result in the cessation of communications relating to placement services.

The data subject may also manage their preferences regarding the receipt of communications separately via the features available on the platform.

Withdrawal does not affect the lawfulness of processing carried out on the basis of consent previously given.

The choices made by the data subject are recorded in order to ensure they are respected and to enable the Data Controller to demonstrate compliance with the obligations laid down by law.

7. Option to prevent the loading of tracking pixels

The data subject may also restrict the loading of tracking pixels via their email programme settings, for example by disabling the automatic downloading of images or by viewing messages in text-only format.

These settings may prevent the loading of images used to detect when messages are opened, but they do not replace the management of consent and may affect the display of other content in the communications.

Furthermore, disabling the loading of images does not necessarily prevent the detection of clicks on links containing tracking identifiers.

8. Parties involved in the processing

For the management and sending of communications relating to placement services, the University of Parma uses the AlmaLaurea platform.

The technical operations involved in sending messages and the possible use of tracking tools may be carried out using technological components provided by third parties.

Personal data is processed exclusively by authorised staff and by external parties entitled to access it, in accordance with their respective roles and responsibilities as defined by data protection legislation.

9. Retention period

Personal data relating to the opening of messages and links clicked on is retained exclusively for the period necessary to fulfil the purposes indicated above, in accordance with the principles of proportionality and data minimisation.

The maximum retention period for individual tracking data is 24 months.

In the event of withdrawal of consent, no further individual tracking data will be collected for the purposes subject to that consent.

Information relating to the choices made by the data subject is retained for the period necessary to ensure compliance with those choices and to document the lawfulness of the processing, including in the event of any disputes.

10. Rights of the data subject

The data subject may exercise, in the cases and within the limits provided for by law, the rights recognised by Articles 15–22 of the GDPR, including the right of access, rectification, erasure and restriction of processing.

They may also withdraw any consent given for tracking at any time, in accordance with the procedures set out in point 6.

To exercise their rights, data subjects may contact the University of Parma or the Data Protection Officer using the contact details provided in point 1.

This is without prejudice to the right to lodge a complaint with the Data Protection Authority, in accordance with Article 77 of the GDPR.

For matters not expressly provided for in this appendix, please refer to the general privacy notice on the processing of personal data of students at the University of Parma.

Date updated: November, 3rd 2026

UNIVERSITÀ DI PARMA

DECLARATION OF ACKNOWLEDGEMENT
and
CONSENT TO THE PROCESSING OF PERSONAL DATA

for communication purposes involving the collection and processing of images (photographs) and audio-visual recordings

The undersigned_____, hereby declare that I have received the information notice pursuant to Article 13 of the GDPR set out above and

☐ Agree ☐ Disagree

to the processing of personal data for the purposes of "*Communication activities involving the collection and processing of images (photographs) and audio-visual recordings of pupils*" – purpose G) of the privacy notice.

Place, date_____,_____/_____/_____

Signature _____

COPYRIGHT DISCLAIMER

Furthermore, should the undersigned consent to the dissemination of the material, he/she GRANTS, FREE OF CHARGE, the economic rights under copyright relating to the pursuit of the purpose set out in the privacy notice.
Taking into account and in accordance with Article 10 of the Civil Code and Articles 12, 96 and 97 of Law 633/1941, the undersigned authorises the publication and/or dissemination, in any form and free of charge, of their likeness/image, footage and audio/video recordings – including in partial, modified or adapted form – for the purposes of dissemination, promotion and institutional communication. The undersigned authorises the publication of the material (photographs, videos) by granting, free of charge, the relevant rights of use for all promotional and editorial purposes under an unlimited buy-out arrangement (including, by way of example, advertising in the press, on television, on billboards, on the internet, on social media, in BTL material, in videos, in publications, etc.). The participant also prohibits the use of such material in contexts that would undermine their personal dignity and decorum. The provision and use of the images are to be considered as carried out free of charge.

Date_____/_____/_____

Signature for copyright disclaimer _____