# INFORMATION PURSUANT TO ART.13 OF EU REGULATION 2016/679 (GDPR) ON THE PROCESSING OF PERSONAL DATA OF USERS OF THE INTERNET PORTAL "ORA" (Online Registration Application)

The University of Parma informs the Users concerned in regards to the use of their personal data collected via the portal ora.unipr.it. In particular, the present document addresses the processing of personal data provided for the online registration to Conferences, Events and Courses at the University of Parma (henceforth referred to "Event" for brevity), and activities connected to registration, including the issue of payments (invoices) to UniPR.

With regards to the latter aspect, the University of Parma, as a public institution and in accordance with legislation, uses PagoPA, the electronic payment system created to render payments to public authority entities simple, safe and transparent. The portal "PagoPA Spontaneous Payments" is managed by PagoPA S.p.A, which independently manages the personal data of those who use the online platform to make a payment to public authority entities and from whom it is possible to obtain the relevant information regarding their use of said data.

The University, to the extent applicable, endeavors to manage the data acquired in accordance with the EU regulation 2016/679 general principles of lawfulness, integrity, transparency, competency, relevance and necessity, through the use of appropriate technical and organisational measures in order to protect the privacy and rights of users.

## **1. DATA PROCESSING PARTIES**

The **Data Controller** is the University of Parma, whose headquarters are located in via Università 12, 43121 Parma, Italy. Tel. +390521902111

Email: protocollo@unipr.it PEC: protocollo@pec.unipr.it The **Data Protection Officer** can be contacted via the following: Email: dpo@unipr.it Pec: dpo@pec.unipr.it

## 2. CATEGORIES OF PERSONAL DATA

2.1 Examples of the types of data that the University processes are:

 a) personal and contact data supplied by the user, including: name and surname/title, telephone number, fax number, pec e-mail address, national insurance number/VAT registration number, SDI code, as well as iPA code, where applicable;

- 2.2 The data can also include your image and/or an audio registration taken via audio-video recording systems, which may be installed in the locations and rooms of the University where the Event takes place, also necessary for the practices of distance learning (live streaming), and/or online learning (e-learning), and/or solely for the means of archive documentation.
- 2.3 We also inform you that CCTV systems are in use within the University buildings and grounds, whose presence is appropriately marked prior to entering said areas by the presence of warning notices, in accordance with the General Guidelines on Video Surveillance, issued by the Italian Data Protection Authority ("Garante") on the 8<sup>th</sup> April 2010 ("Video surveillance Measures"). Therefore, the Data also includes your image as visualized and/or recorded by CCTV systems.

#### **3. PURPOSE OF DATA PROCESSING AND LEGAL BASIS**

3.1 The data collected is used for the following objectives:

- a) The fulfilment of contractual and legal obligations arising from and/or related to the already contracted or potential participation of the person concerned in the Event;
- b) For sending communication and material concerning the Event to the person concerned;
- c) For the organisation and management of the Event itself, including the issue of payment invoices generated through the portal UGOV-CO (UGOV Accounting);
- d) Your personal data (images, photos and audio-visual footage), where collected, can be used for educational purposes, also at distance, concerning, for example, the audio-visual recording of the Event and its use in live video streaming and/or e-learning modalities, or solely for archive documentation.

The capture and use of the images is considered to be free of charge.

The University undertakes not to make any use of the images that may prove to be detrimental to the dignity, reputation or decorum of the person concerned.

- 3.2 The processing of personal data is legitimised by the following legal bases:
  - 1. the necessity of its processing for the conclusion and the execution of a contract, also during the precontractual phase (art. 6 par. 1 lett. b of the GDPR);
  - 2. the necessity of its processing to fulfil legal obligations to which the Data Controller is subject (art. 6 par. 1 lett. c of the GDPR);
  - the necessity of its processing for the fulfilment of a task which is of public interest or related to the activities of the Data Controller as public authority (art. 6 par. 1 lett. e of the GDPR), D.lgs n.82/2005 "Digital Administration Code", D.L. n.179/2012.
- 3.3 The processing of data as outlined in point 3.1, lett.d), however, has as its legal basis your explicit consent according to art. 6 para. 1 lett. a) of the GDPR.

3.4 Lastly, your personal data, can be processed, without the necessity of your expressed consent, in cases where this is necessary to comply with obligations arising from civil and tax laws, EU legislation, as well as rules, codes or procedures approved by authorities and other competent institutions. Furthermore, your personal data can be processed in response to requests from competent administrative or judicial authorities and, more generally, from public entities, in compliance with the law. In addition, your personal data may be processed for motives of defence, whenever it may prove necessary in order to ascertain, exercise or defend the right of the Data Controller.

## 4. DATA PROCESSING PROCEDURES

The processing of your data will be carried out by means of electronic and printed tools.

In order to register for your chosen Event you will must connect to the portal ora.unipr.it, select the Event of interest to you, enter your personal data required for registration, including the billing data as indicated above. At the end of the registration procedure, the "ORA" portal will calculate the participation fee for the selected event and provide a link to the portal "PagoPA Spontaneous Payments" of the bank affiliated with the University, in order to be able to proceed with payment. The payment system will at the same time generate a receipt summary of the payment to the event to which you signed up, with the date, time, amount paid and payment description. Subsequently, the billing data indicated above will be transmitted from the "ORA" Events Portal to the UGOV-CO (UGOV - Accounting) portal, which will generate and send the invoice to the client via the method chosen during the registration process to the event (email, PEC, SDI, iPA or VAT number, or for individuals in possession of an account at the Inland Revenue Agency, to their account inbox). The computer systems used are equipped with measures to ensure data confidentiality and to prevent loss, illicit or incorrect use of, and unauthorized access to, the data.

#### 5. NATURE OF THE PROVISION OF DATA AND CONSEQUENCES OF REFUSAL

- 5.1 The provision of data as referred to in point 2.1 lett. a), b) and 2.3 is mandatory for the completion of activities related to registration management and subsequent billing. Refusal to adhere to the measures, therefore, results in the failure to conclude the registration process and the consequent impossibility to participate in the Event of your choice. By entering the data indicated during the registration process, you consent to the data processing in line with the objectives indicated above.
- 5.2 The provision of specific data (image and audio), referred to in point 2.2 lett. d), is optional and requires an expression of consent. Failure to give said consent will lead to the exclusion of the person concerned from audiovisual footage or photographic content. Consent will be deemed to be expressed:
  - with your registration via the portal ora.unipr.it to Events organized by UniPR, through the voluntary act of the person concerned attending the location where the Event is being held (e.g. conference rooms, spaces used for events, areas within the recording range of audiovisual recording equipment in

classrooms, etc.) where image or audio-video recording has been activated. These spaces will be clearly identified by appropriate information notices;

5.3 No automated process will be adopted, including profiling as referred to in art. 22, paragraphs 1 and 4, of the GDPR.

### 6. CATEGORIES OF DATA RECIPIENTS AND POSSIBLE TRANSFER OF DATA OUTSIDE THE EU

- 6.1 The personal data collected by the University of Parma may be communicated for the purposes listed above to partners and sponsors of the Event and, by way of example and not solely to external institutions or companies acting on their behalf, including:
  - External companies, in the capacity of data controllers, with whom exist or could be drawn procurement or service contracts for the fulfilment of which the processing of personal data of individuals could be necessary;
  - Companies associated with the University ex D. Lgs n. 175/2017;
- 6.2 Your data, in the cases envisaged, may also be communicated to:
  - authorities responsible for inspection and tax and administrative verification activities;
  - judicial authorities;
  - any other public body in cases as specified by EU or Italian law
- 6.3 The University guarantees the utmost care so that the communication of your personal data to the aforementioned recipients concerns only data necessary to achieve the specific purposes for which they are intended. Your personal data will be processed by employees/consultants/collaborators of the Data Controller, who have been specially trained in the methods and purposes of data processing. Your personal data is stored in the computer systems of the Data Controller and third parties to aid the activity of service provision. This data will not be disclosed to third parties, except in the cases as outlined above and, in any case, within the limits hereby indicated and solely with your consent.
- 6.4 The communication of personal data to recipients outside the EU or to international organisations is not envisaged.

## 7. DATA STORAGE

The data will be kept for a period of time no longer than necessary for the purposes for which it was collected or subsequently processed, in accordance with the provisions of law. In reference to point 2.2, images, photos and audio-video footage may be kept in the archives of the University in order to conserve historical memory of events and institutional activities for the purpose of possible future historical publications. The storage of said data, however, will be maintained for a period of time not exceeding the achievement of the purposes for which it is processed and for which consent is granted (where provided), unless there is a renewal of consent or specific authorization from the Italian DPA (Autorità Garante della Privacy) or transformation of the data into anonymous form. The verification of obsolescence of the stored data in relation to the purposes for which it was collected is carried out periodically.

## 8. RIGHTS OF THE DATA SUBJECT

In your capacity as Data Subject, you have the following rights as referred to in Articles 15, 16, 17, 18, and 21 of the GDPR:

- <u>Right of access</u>: You have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you is being processed and, if so, to obtain access to said personal data and the following information: (i) the purposes of the data processing;
  - a) the categories of personal data concerned;
  - b) the recipients or categories of recipients to whom the personal data has been or will be disclosed, in particular recipients situated in other countries or international organisations;
  - c) where possible, the expected duration of personal data storage or, if not possible, the criteria used to determine said period;
  - d) the right to lodge a complaint with a regulatory authority;
- <u>Right to rectification and deletion</u>: You have the right to obtain the rectification of inaccurate personal data concerning you and, taking into account the purposes of the data processing, the right to request the completion of incomplete personal data, by providing a supplementary statement.

You also have the right to obtain the deletion of your personal data in one of the following cases:

- a) the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- b) the data was processed unlawfully;
- c) you have revoked the consent according to which the Data Controller had the right to process your data and there is no other legal basis that allows the Data Controller to process it;

d) you are opposed to the activity of data processing and there is no overriding legitimate reason for it to be carried out;

e) the personal data must be deleted in order to fulfil a legal obligation. However, the Data Controller has the right to disregard the aforementioned rights of data deletion if the right to freedom of expression and information prevails, or to fulfil a legal obligation, or to defend its own rights in a court of law;

- <u>Right to restriction of data processing</u>: You have the right to obtain from the Data Controller a restriction of data processing in one of the following cases:
- a) for the period necessary for the Data Controller to verify the accuracy of your personal data when the accuracy of said data is contested;
- b) unlawful processing of your personal data;

- c) even if your personal data is not necessary for the purposes of data processing, in any case it is necessary that it is processed for the examination, exercise or defence of a right in a court of law;
- d) for the length of period necessary in order to verify the possible prevalence of legitimate reasons which the Data Controller may have with respect to your opposition to the data processing;
- Right to complaint: You have the right to lodge a complaint with the relevant regulatory authority, the Italian Data Protection Authority (www.garanteprivacy.it).

## 9. PROCEDURES FOR THE EXERCISING OF RIGHTS

The request can be submitted, also by email, to the Data Collector or alternatively to the Italian DPO, using the contact details stated above, and the appropriate form which can be found via the following link

https://www.unipr.it/sites/default/files/albo\_pretorio/allegati/04-02-2020/modello\_richiesta\_diritti\_interessati.pdf

The Data Controller is required to reply within one month from the date of receipt of the request, a period that can be extended up to three months in the case of a request of elevated complexity. If conditions apply, the person concerned also has the right to lodge a complaint with the regulatory authority (<u>www.garanteprivacy.it</u>) in accordance with the procedures laid down in Regulation (EU) 2016/679.