

## **INFORMATION FOR THE PERSONAL DATA PROCESSING OF INTERNATIONAL MOBILITY PROGRAMS CANDIDATES**

This Information is published according to Article 13 of the EU Regulation 2016/679 on Data Protection, in relation to your personal data the University of Insubria, with registered office in Via Ravasi 2, 21100 Varese, in the person of the Rector Prof. Alberto Coen Porisini, his Legal Representative, as Data Controller, will come into possession for the purposes referred to in point 3

For a better understanding of this information, please note that the data controller is, in this case, the legal person determining the purposes and means for the personal data processing.

Personal data are information about an identified or identifiable natural person (called "data subject"). Particular data categories are data related to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data intended to uniquely identify a natural person, health status or sexual life related data, sexual orientation. Judicial data are data relating to criminal convictions, crimes and security measures.

Personal data processing means any operation or set of operations, performed on personal data or on sets of personal data, whether or not by automated means, even if not recorded in a database, such as collection, registration, organization, structuring, storage, processing, selection, blocking, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, cancellation or destruction. The processing may be carried out manually (eg: paper forms collection) or electronically or in any case with the aid of computerized or automated tools. According to the law, the processing of your personal data will be based on principles of correctness, lawfulness and transparency and protection of your privacy and your rights.

We therefore provide you with the following information:

### **1. DATA CONTROLLER, DATA PROTECTION OFFICER (DPO)**

The data controller is the University of Insubria, with registered office in Varese (VA) Via Ravasi 2, in the person of the Rector. The contact details of the Data Controller are: [ateneo@pec.uninsubria.it](mailto:ateneo@pec.uninsubria.it)

The Data Protection Officer (DPO) is Dr. Giuseppe Vaciago. The DPO contact details are: [privacy@uninsubria.it](mailto:privacy@uninsubria.it), [privacy@pec.uninsubria.it](mailto:privacy@pec.uninsubria.it)

### **2. DATA PROCESSING**

The following data may be processed:

1. personal data, contact details (name, surname, date and place of birth, residence, citizenship), identity document, ID photo, contacts, visas / residence permits for non-EU students, bank details for the payment of mobility contributions
2. data related to previous and current studies;
3. Special categories of data (art. 9 of GDPR), such as the health status (for disabled students and staff) for the access to additional funds specifically provided by international mobility programs.

### **3. PROCESSING TASKS and LEGAL BASIS**

#### **a) Tasks carried out in the public interest**

- Processing of data related to the health status (for disabled students and staff) for the access to additional funds specifically provided by international mobility programs.
- Processing of data related to the health status (for disabled students and staff) for access to support measures and tools, where applicable, in the host institutions.

#### **b) Contractual Tasks**

- verification of the requirements for the participation in selection procedures for the admission to international mobility programs and the absence of causes impeding the participation;
- determination of the score and the position in the ranking lists;
- management of credit recognition procedures;
- Management of curricular and extra curricular traineeships performed within the frame of the Erasmus + Traineeship action;
- Calculation of the international mobility grant amounts;
- disciplinary procedures for students.
- use of telematic and e-mail services;
- access to laboratories and restricted areas;
- communications related to the academic career.

#### **c) Legal Obligations**

- application of safety measures in the workplace, according to D.lgs. 81/2008;
- filing and storing of data concerning the studies performed during the mobility period;
- participation to selection procedures;
- legal data processing.

#### **d) Legitimate interests**

- surveys for the assessment of administrative and educational aspects related to international mobility programs;
- statistics, on aggregated or anonymous data, without the possibility of identifying the data subject;
- disclosure of contact data to students who explicitly request it in order to disseminate information and allow the sharing of experiences and problems related to the preparation and implementation of international mobility periods (Buddy System).

The legal basis of the data processing, according to art. 6, paragraph e) and, for particular data, art. 9 paragraph 2 letter g) of the GDPR is the need to fulfill the public interest tasks of the Data Controller. As a higher education and research institution, the University of Insubria operates according to the art. 33 of the Constitution, the art. 6 of the law n. 168/1989 and its Statute, published in the GURI 31 March 2012, n. 77). With specific regard to international mobility programs, the Data Controller operates according to the Regulation of the European Parliament and Council 1288/2013 establishing "Erasmus +" the Union program for education, training, youth and sport. Further data are processed according to art. 6, paragraph b) and c) and f) of the GDPR, as they are necessary to fulfill a contract of

which the data subject is a party or to perform pre-contractual or contractual measures taken at the request of the same, or to fulfill a legal obligation of the data controller or by virtue of a legitimate interest of the data controller for the improvement of the offered services.

#### **4. DATA COLLECTION**

Data collection, for the tasks referred to paragraphs a), b) and c) of the art. 4, is needed to access the selection procedures for international mobility programs and to manage the phases of preparation, implementation and completion of international mobility periods, the career and the provision of services, except for data related to disabled students and staff as referred to in paragraph a) which is optional, any refusal to provide such data implies the impossibility to access additional funds or specific services in the host institutions for mobile students and staff.

The data collection, for the tasks referred to paragraph d) of art. 4 is optional; any refusal to provide such data implies the impossibility for the data controller to acquire useful information for the improvement of its services and the impossibility for the University to communicate your contact details to students who request it for sharing similar experiences.

#### **5. COLLECTION MODALITIES**

Data collection is performed in compliance with the principles of lawfulness, correctness, relevance, completeness and not over estimation in relation to the tasks they are processed for. Personal data are processed in compliance with the principles of lawfulness, fairness and transparency, as required by law, with the aid of instruments to record and store the data and in any case to guarantee the safety and to protect the privacy of the data subject

#### **6. DATA STORAGE PERIOD**

Personal data and data related to selection procedures are stored indefinitely over time, even for historical reasons, according to the filing obligations imposed by current legislation (Italian Presidential Decree 445/2000, legislative decree 42/2004, december 3 December 2013 ).

The additional documentation relating to the period of international mobility already performed, is stored according to the prescriptions established by the University's Conservation Manual

#### **7. DATA RECIPIENTS and AUTHORIZED DATA PROCESSORS**

Data processed for the above mentioned tasks may be disclosed to the teaching or administrative staff of the University of Insubria.

The University may disclose contact data to students who explicitly request it in order to disseminate information and allow the sharing of experiences and problems related to the preparation and implementation of international mobility periods (Buddy System).

The University may disclose personal data to other public administrations if they have to process such data for any proceedings within their institutional competence as well as to all those public bodies to

whom, in the presence of the relevant conditions, the communication is mandatory by EU laws, in particular:

- Erasmus + National Agency - Italy
- European Commission
- MIUR (Italian Ministry of Education)
- Higher Education and Research Institutions in Member Countries or in Countries participating to the Erasmus + Program;
- Extra european Higher Education and Research Institutions;
- Local Bodies, Ministry of Foreign Affairs, Police Stations, Italian Consulates and Embassies, foreign Consulates and Embassies in Italy;
- Judicial authority;
- For students selected within the frame of international mobility programs for traineeship (Erasmus + Traineeship), to public or private bodies, as defined by the Decision n. 170/2006/CE establishing the Lifelong Learning Program (LLP), in Member Countries or in Countries participating to the Erasmus + Program;

The management and storage of the collected personal data takes place at the University and / or service providers that, for the sole task of the requested service, may be appointed as Data Processors according to art. 28 of the GDPR. The Data Processors are

- CINECA Consorzio Interuniversitario, as provider of the students affairs registration and management system ESSE3 – Legal Seat: via Magnanelli 6/3 - 40033 Casalecchio di Reno (BO);
- ASPidea Srl, as provider of the Erasmus + Actions registration and management system, Legal Seat: via G. Ungaretti, 27 - 87036 Rende (CS);
- The Bank managing the University's treasury service
- The companies managing the students dormitories.

The complete and updated list of the data processors is available on request to the Data Controller.

## **8. TRANSFERS OF PERSONAL DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS**

In most cases data will be transferred to member countries of the European Union where they will be processed in compliance with the principles of the GDPR. Should it be necessary to transfer data to non-European countries, the provisions of Chapter V of the GDPR will be adopted, in particular:

- According to art. 45, par. 3 of the GDPR the existence of adequacy decisions will be verified concerning the country of the recipient organization;
- In the absence of an adequacy decision by the European Commission on a specific country, the University, according to art. 46 of the GDPR, will adopt specific contractual safeguards with the recipient institution or organization;
- If none of the above mentioned measures is available, the University will request the explicit consent of the data subject for the proposed transfer, having provided the data subject with appropriate information of the possible risks related to such transfers.

## **9. RIGHTS OF THE DATA SUBJECT**

According to Art. 15, 16, 17, 18 and 20 of the GDPR, the Data Subject rights against the University of Insubria as Data Controller are:

- Right of access to all personal data and information;
- Right to rectification of all personal data and information by the data subject;
- Right to erasure of all personal data and information except for those contained in documents that must be stored by the University and unless there is a legitimate overriding reason to proceed with the processing;
- Right to restriction of processing;
- Right to object to processing of personal data
- Right to data portability;
- Right to revoke any consent given for non-mandatory data processing.

To exercise these rights, the Data Subject may contact the Data Protection Officer by e-mail to: [privacy@uninsubria.it](mailto:privacy@uninsubria.it).

## **10. CLAIM**

The Data Subject has the right to claim to the Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)) or to the EU State Authority where the data Subject usually resides or works, or to the place where the violation occurred, in relation to a non compliant data processing.

## **11. CHANGES TO THIS INFORMATION**

This information may be changed. We suggest to check regularly this information and to refer to the most updated one.