UNIVERSITÀ DI SIENA 1240

INFORMATION ON THE PROCESSING OF STUDENTS' PERSONAL DATA

The University of Siena invites you to read the following information notice drafted pursuant to Article 13 of EU Regulation 2016/679 "on the protection of natural persons with regard to the processing of personal data and on the free movement of such data" (hereinafter "Regulation"), also known by the acronym GDPR (General Data Protection Regulation).

For the purposes of this notice, the **"**data subject**"** is the student, as the identified or identifiable person to whom the data refers. "Student" here also includes those who use inbound and outbound guidance services, participants in selection procedures for restricted-access courses or initial knowledge verification tests, graduates,and thoseenrolledinpostgraduatecourses.

The University of Siena, in line with current legislation, will not use automated processes for student profiling and will process your personal data, including "special categories of data" indicated in Article 9 of EU Regulation 2016/679 (e.g., health data, racial or ethnic origin, political opinions, trade union membership, biometric data) according to the principles established by Article 5 (lawfulness, fairness, transparency, adequacy,relevance, accuracy,etc.).

Your data will be collected and processed in paper or computer format and will populate paper and/or computerarchivesfortheadministrativeandeducationalmanagementofyourcareer.

I. DATA CONTROLLER

The Data Controller is the University of Siena, with registered office at Banchi di Sotto, no. 55, 53100, Siena, represented by the Rector, Prof. Roberto Di Pietra.
Contact details:

- Email:rettore@unisi.it
- PEC (CertifiedEmail)**:** rettore@pec.unisipec.it

The Controller is the natural or legal personwho "determinesthepurposesandmeansoftheprocessing of personaldata"(Article4,No.7oftheRegulation).

II. DATA PROTECTION OFFICER (DPO)

The Pro Tempore Data Protection Officer of the University of Siena is indicated at: https://www.unisi.it/ateneo/adempimenti/privacy Contact details:

- Email:rpd@unisi.it
- PEC(Certified Email):rpd@pec.unisipec.it UndertheEuropeanRegulation,theDPO is

tasked with duties indicated in Article39,including:

- Providingadvicetothecontrollerandemployeescarryingoutprocessing;
- MonitoringcompliancewiththeRegulation;
- Cooperatingwithand actingasacontactpointforthe supervisoryauthority.

Datasubjects"maycontactthedataprotectionofficerwithregardtoallissuesrelatedtoprocessingoftheir personaldataandtotheexerciseoftheirrightsunderthisRegulation"(Article38,paragraph4).

III. PURPOSES OF PROCESSING

Your personal data will be processed for purposes related to the performance of institutional tasks. Specifically:

a) Selection and admission procedures for restricted-access and postgraduate courses;
b) Pre-enrollment and pre-registration for international students;
c) Enrollment, registration, and management of the university career until graduation;
d) Management of postgraduate careers (PhD, Masters, specialization schools, etc.);
e) Identification of the student (e.g., via facial photo);
f) Initial knowledge verification tests;
g) Determination of university fees and calculation of amounts;
h) Management of double degree programs;
i) Management of curricular and extracurricular internships;
j) Use of library services and electronic resources;
k) Access to laboratories and protected structures;
l) Use of IT services (university email, e-learning platforms) and assessment of access requirements;
m) Attendance tracking for mandatory courses;
n) Student representation elections and designations;
o) Potential disciplinary proceedings;
p) Guidance, tutoring, and job placement actions, including communication to public and private entities for employment purposes (e.g., AlmaLaurea, private companies, Bank of Italy, ISTAT);
q) Provision of distance learning services;
r) Promotion of international student mobility programs;
s) Provision of financial benefits (grants, exemptions, scholarships, 150-hour part-time work);
t) Access to services related to the Right to University Study (DSU);
u) Statistical surveys and evaluation for service improvement;
v) Sending notices and newsletters regarding University events;
w) Management of an "alias career" for students in gender transition;
x) Services for students;
y) Services for students with disabilities (chronic or temporary) and/or Learning Disabilities (DSA);
z) Maternity protection services and benefits;
aa) Services for students in detention or under personal freedom restrictions;
bb) Organization and provision of student services, including through agreements with public and private entities;
cc) The use of student data to analyze academic careers (such as potential delays or dropouts). For this reason, the University may contact students and alumni to participate in statistical surveys and questionnaires; participation remains, however, free and optional.

IV. LEGAL BASIS FOR PROCESSING

The processing of your personal data by the University will be carried out based on at least one of the following conditions for lawfulness (or "legal bases for processing"):

- Consent expressed by the data subject or, where necessary, by their legal representative (e.g., in the case of minor students), for one or more of the processing purposes indicated in point III of this notice;
- Compliance with a legal obligation;
- Performance of a task carried out in the public interest or in the exercise of official authority;
- Pursuit of a legitimate interest, consisting of the achievement of the purposes indicated in point III of this notice;
- Obligation to perform a contract.

The processing of personal data belonging to "special categories" (formerly "sensitive data") revealing "racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as [...] genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or a person's sex life or sexual orientation" (Article 9 of the Regulation) will be carried out based on at least one of the following conditions for lawfulness:

- Explicit consent of the data subject for one or more of the purposes indicated in point III of this notice;
- Necessity to pursue substantial public interests on the basis of European Union or Italian law;
- Necessity to establish, exercise, or defend a legal claim;
- Archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes.

The processing of judicial data (relating to criminal convictions, the commission of offenses, the execution of security measures, or other measures restricting personal freedom) will be carried out to the extent strictly necessary for the performance of the purposes indicated in point III of this notice (for example: services for incarcerated students; the conduct of any disciplinary proceedings).

V. DATA RECIPIENTS

The following may have access to your data for the purposes indicated in point III:

- The Data Controller (the University of Siena);
- Employees and collaborators of the University who, operating under the authority of the Controller, carry out processing activities, each in relation to their specific duties.

VI. EXTERNAL RECIPIENTS OF YOUR DATA

In compliance with current regulations, your data may be transferred to public or private entities for the purposes of organizing, implementing, and providing student services, including in relation to the signing of agreements with other public and private parties.

Your personal data may be communicated to other public administrations (e.g., the Ministry of University and Research, the Tuscany Region, the Regional Agency for the Right to University Education of Tuscany, the Province and the Municipality of Siena, other Universities) whenever this is necessary for the pursuit of institutional purposes or to comply with obligations prescribed by current legislation.

For study programs that involve access to healthcare and hospital facilities, data will be communicated to the Siena University Hospital (*Azienda Ospedaliera Universitaria Senese*) or to other competent bodies.

Furthermore, your data may be communicated to inter-university consortia (such as, for example,

AlmaLaurea,whichprovidesservicesaimedatfacilitatingtheentryofgraduatesintothelabormarketand professions); as well as to insurance companies for the management of accident claims or to banking institutions for one of the purpose sindicated in pointIIIofthisnotice(e.g.,the payment of university fees).

Your data may be communicated, transferred, or otherwise made available to public and private entities (e.g., AlmaLaurea, private companies, foundations, etc.) for specific occupationalpurposes, inbound orientation, tutoringactivities,andoutboundorientation,includingactionssupportingentryintothelabormarket.

The Data Controller also reserves the right to communicate your data to Data Processors (i.e., natural or legal persons who process personal data on behalf of the Controller) appointed in accordance with Article 28 of the Regulation.

VII. DATA TRANSFER TO THIRD COUNTRIES

Yourpersonaldatamay be transferredto consularoffices, embassies, andabroad, instrictcompliance withthe provisions of the Regulation, including to countries outside the European Union when necessary for the management of international student mobility programs, "double degree" programs, for the assessment ofadmissionrequirements,orforanyotherpurposeindicatedinpointIIIofthisnotice.

The transfer to non-EU countries, in addition to cases where this is guaranteed by adequacy decisions of the European Commission, is carried out in such a way as to provide appropriate and suitable safeguards pursuant to Chapter V of EU Regulation 2016/679, "Transfers of personal data to third countries or international organizations"(Articles44-50).

VIII. RIGHTS OF THE DATA SUBJECT

In your capacity as a data subject, you may exercise all the rights provided for in Articles 15 et seq. of the European RegulationtowardtheUniversityofSiena.Inparticular,youmayobtain:

- AccesstoyourpersonaldataandtoallotherinformationindicatedinArticle15;
- Rectification of data if they are inaccurate and/or the integration of data where they are incomplete;
- Erasure (the so-called "right to be forgotten"), except for information that must mandatorily be retained by the University (e.g., data relating to your university career) and unless there is a prevailing legitimate reason for the continuation of the processing activity that outweighs the interestofthe data subject;
- RestrictionofprocessinginthecasesindicatedinArticle18.

BasedontheprovisionsoftheEuropeanRegulation,youalsohavetheright:

- To object to the processing of your data, except in cases where the processing is necessary for the performanceoftaskscarriedoutinthepublicinterest(Article21);
- Todataportability, in the formsand withinthelimitsprovidedforbyArticle20ofEUReg.2016/679;
- In cases where the processing of data is lawfulby virtue of your consent, you have the right to withdraw said consent. However, the withdrawal of consent does not affect the lawfulness of the processing activity carried out prior to the withdrawal (Article 7, paragraph 3 and Article 13, paragraph 2, letter c).

IX. HOW TO EXERCISE RIGHTS AND LODGE COMPLAINTS

To exercise your rights, contact the Controller (see Point I).

For reporting security violations (data breaches), use the specific service at: abuse@unisi.it. The University will respond within one month (extendable to three months for complex cases).

You also have the right to lodge a complaint with the Supervisory Authority (in Italy: Garante per la protezione dei dati personali - www.garanteprivacy.it).

X. DATA RETENTION PERIOD

Your data will be stored using appropriate security measures to prevent access by unauthorized personnel and to ensure their confidentiality and integrity. The determination of the retention period will be defined according to the principle of "necessity of processing." Therefore, regarding retention times, your data and the documents containing them will be kept for the period necessary to fulfill legal obligations and management, administrative, and educational requirements. Specifically:

- Data concerning your university career will be kept indefinitely, taking into account the archiving obligations provided for by current legislation and the provisions of the University of Siena's records disposal schedule (*massimario di scarto*);
- Data relating to the use of IT systems (e.g., time and duration of connection) or the use of email will be processed using automated tools and kept only for the time strictly necessary to achieve the purposes for which they were collected, unless otherwise provided by law (maximum 12 months);
- Data relating to any disciplinary proceedings to which you may be subject will be kept indefinitely, except in cases where the final provision is annulled by a final judgment (*sentenza passata in giudicato*) or revoked by the administration.

XI. MANDATORY OR OPTIONAL NATURE OF DATA PROVISION

The provision of your data for the purposes indicated in letters a) to o) of point III of this notice is mandatory for the establishment of the relationship between the student and the University.

The provision of your data, including those belonging to special categories (formerly "sensitive data"), for the remaining purposes indicated in point III of this notice is optional. However, should you decide not to provide them, the University of Siena will not be able to guarantee the benefits or the provision of services for which the data collection is intended; in particular, we invite you to pay attention to the processing activities listed from letter w) to z) which, if activated, will require the processing of data belonging to special categories (Article 9 GDPR) and/or relating to criminal convictions (Article 10 GDPR).

Processing activities involving aggregated and anonymous data fall outside the scope of the Regulation.

This notice may undergo changes and/or updates over time. It is therefore recommended to consult and refer to the most recent version which, in the event of an update, will be published on the University portal in the "Privacy" section (https://www.unisi.it/ateneo/adempimenti/privacy).

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