

UNIVERSITY OF PAVIA
PRIVACY POLICY
(in compliance with D. Lgs. N. 196/2003)

Premise

In compliance with art. 13 - D. Lgs. n. 196/2003, the University of Pavia would like to take the opportunity to inform users (prospective students, newly enrolled students, students enrolled in all degree courses, in schools of specialisation, in Master's courses, and graduates), about the use of their personal information, including information defined as 'sensitive'. Examples of sensitive data might be: information about the state of health, the membership of a student political group, the ethnic background, the presence of a disabled person in the household and may have been gathered directly from the interested party or from educational institutions attended prior to starting a university career or during university years. The handling of such data is essential for the University to perform its office and to provide students with educational and supplementary services. The self-executed certificates issued by students in compliance with D.D.R. 445/2000 (and further modification as per L. 183/2011) will be submitted to verification as per current legislation and false statements will be reported to the legal authority in charge.

The University of Pavia has established a series of regulations to safeguard the privacy of such information in implementing D.Lgs 196/2003, including the adoption of the Regulations for the Handling of Sensitive and Legal Data. Users' personal data will be handled according to the following regulations.

1. Purpose of data handling

Types of personal data that are gathered and handled:

- a) data that are input directly from the user when registering on-line, enrolling at university, submitting the graduation request, applying for research degrees, admission tests to fixed-number courses, specialisation schools, Master's degrees, post-graduate courses or an announcement of a competitive examination;
- b) tax and salary details entered on-line in the procedure to work out the university tuition fees;
- c) data occasionally provided by users in relation to specific requested services;
- d) data related to the user's university career;
- e) data provided when enrolling for qualification exams held at the University of Pavia.

This data will be handled exclusively for the fulfilment of the University's legal obligations, for the pursuit of the University's institutional tasks and, in particular, for the fulfilment of the legal obligations regarding the management of the didactic and administrative relationship between the University and the student, and/or for objectives related to student representative elections to academic bodies or for objectives related to part-time collaborations and placements at the University, as well as the provision of specific services requested by the user. The data can be handled for historical, statistical or scientific reasons, in compliance with the law and ethical guidelines.

2. Data handling methods

Data collection is carried out lawfully, correctly, appropriately, for greater completeness, transparently and without excess as provided for by the law and strictly related to the purposes for which the data is to be handled. The personal data is generally handled by data processing and telecommunications systems designed to memorise and manage the data. In some cases, a hard

copy may be generated; this process is always undertaken to ensure security and protect the privacy of the interested party.

3. Provision of personal data and the consequences of refusal

Conferring personal data is, generally, obligatory. The non-conferral of personal data under point 1, lett a), b), d), e) precludes the establishment or continuation of a relationship with the University. The non-conferral of personal information as indicated under point 1, lett c) will make it impossible to access the requested services.

4. Categories to which personal data could be passed on or who may come into contact with personal data in managerial quality or as those who have been appointed to handle the data

Users' personal data, in accordance with current laws, may be revealed to and processed by personnel involved specifically in their handling.

The personal data conferred to the University may be passed on to other public sector bodies, excluding public sector financial bodies, with which the University exchanges information in order to fulfil its institutional tasks.

In particular, personal data may be passed on to the following bodies:

- to M.I.U.R. for inclusion in the National Student Records database (established by Law n. 170/2003) to monitor the career development of all university students;
- to the Ministry of Finance;
- to inter-university or mixed consortiums and to public and private organisations in order to favour careers advice, training and work and professional placements for University students and graduates who request them;
- To other individuals or bodies who operate in the sector of international work, study or exchange programmes.

Personal data will also be passed on to banking institutions that, in agreement with the University, manage the receipt/reimbursement of tuition fees and university contributions.

Personal data may be passed on to individuals and bodies carrying out historical, statistical or scientific research, in compliance with the principles outlined in point 2.

Sensitive data about a student's general state of health, political, religious or labour opinions, affiliation to a student political organisation or political party, and information about ethnic background, etc, or data of a legal nature, may be passed on, in pursuit of the objectives stated above, only when provided for by law or regulations. The only exception is when the data is passed on, in compliance with current laws, when requested by police, judicial authorities, information or security services or by other public sector bodies operating in the defence fields, state security and crime investigation, as well as the passing on of personal data to judicial authorities, in compliance with legal obligations, when a crime is suspected.

Personal data may also be passed on to external organisations identified as External managers of data handling (e.g. CINECA or CILEA) or bodies who operate autonomously (EDiSU and other public sector individuals and bodies in charge of research contributions and scholarships).

Aside from the cases described above, personal data is never, for whatever purpose, passed on to third parties.

5. Rights of the interested party

The student may exercise his/her rights pursuant to Article 7 del D.Lgs. 196/2003, including obtaining a copy of the data handled, any updates, modifications or, when requested, make additions, or, in extreme cases, cancel or block data handling that is contrary to the law.

6. Controller and processor of the data

Rights may be exercised by contacting the Data controller (Magnifico Rettore dell'Università degli Studi di Pavia Strada Nuova, 65, 27100 Pavia) or the Data processors (art. 29 del D.Lgs 196/2003), that is:

Management;

Faculty presidents;

Department directors;

Centre directors;

School of specialisation directors.