



**PROCESSING OF PERSONAL DATA
INFORMATION NOTICE FOR ADMISSION (NATIONAL AND LOCAL RESTRICTED
ACCESS), ENROLLMENT, STUDENT CAREER MANAGEMENT AND STUDENT SERVICES**

Personal data provided when participating in selection procedures for **admission (national and local restricted access), enrollment in open-access degree programmes, management of the academic career, provision of student services, and admission to State examinations for professional qualification** are processed in compliance with the General Data Protection Regulation – EU Regulation 2016/679 (hereinafter “Regulation”) and with Legislative Decree No. 196/2003, as amended by Legislative Decree No. 101 of 10 August 2018 (“Personal Data Protection Code”).

This notice is provided pursuant to the General Data Protection Regulation (EU Regulation 2016/679). For information on the processing of personal data aimed at determining scores and ranking positions (with possible assignment to the University of Insubria) within the framework of enrollment in nationally restricted-access degree programmes, reference is made to the specific and separate notice issued by the Ministry of University and Research.

1. Data Controller and Data Protection Officer

The Data Controller is the University of Insubria, represented by the Rector, with registered office in Varese (VA), Via Ravasi 2, PEC address: ateneo@pec.uninsubria.it.

Data subjects may contact the Data Protection Officer to exercise their rights under the GDPR (Articles 12–21) using the following email address: privacy@uninsubria.it.

An updated list of data processors and authorized persons is kept at the Data Controller’s premises.

2. Categories of Data Processed

The data processed include:

- Personal, identification and contact data (name, surname, date and place of birth, tax code, residence, citizenship), identity document, passport photo, contact details, visas/residence permits for non-EU students
- Data relating to previous educational careers (secondary school and any academic careers), qualifications
- Data relating to admission procedures (e.g. results of selection procedures)
- Special categories of data (Art. 9 GDPR):
 - racial and ethnic origin (for non-EU citizens and refugee status)
 - health status (for students with disabilities) for access to support tools for admission procedures, examinations and teaching activities
- Judicial data (Art. 10 GDPR):
 - data relating to detained students (criminal convictions, offences) for defining how teaching activities and administrative procedures for access and career management are carried out

3. Purposes of Processing and Legal Basis

3.1 Contractual purposes

- a) verification of the existence of the requirements for participation in admission procedures and absence of exclusion causes;
- b) determination of scores and ranking position (with possible assignment to the University);
- c) enrollment and attendance of university courses (in-person and e-learning);
- d) management of the academic career and awarding of degrees;
- e) management of curricular and extracurricular internships;
- f) calculation of tuition fees and/or refunds and exemptions;
- g) use of online and email services;

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- i) access to laboratories and other restricted facilities;
- j) sending communications related to the academic career;
- k) disciplinary procedures against students;
- l) election of student representatives and performance of duties related to elected offices within University bodies;
- m) management of activities aimed at obtaining professional qualification (State Exams).

3.2 Legal obligations

- a) implementation of workplace safety measures (Legislative Decree 81/2008);
- b) archiving and storage of academic career data (studies, positions held, qualifications);
- c) participation in procedures to obtain individual services provided by the University;
- d) processing of judicial data.

3.3 Legitimate interest

- a) surveys for evaluating teaching quality and customer satisfaction;
- b) statistics based on aggregated or anonymous data, without the possibility of identifying the user.

3.4 Public interest

- a) processing of special categories of data, such as racial and ethnic origin (non-EU citizens and refugees);
- b) processing of health data (students with disabilities) to provide support tools for admission procedures, examinations and teaching activities.

3.5 Communication and dissemination of data for guidance, training and employment purposes based on consent

As provided for by Article 96 of the Personal Data Protection Code, in order to facilitate orientation, training and employment placement (including abroad), the data subject may authorize the University to communicate or disseminate, also electronically and to private entities, data relating to academic results (intermediate and final) and other relevant personal data for orientation, training and employment purposes, excluding sensitive data and data relating to criminal convictions and offences.

Such authorization may be revoked at any time, without affecting the lawfulness of processing carried out before the withdrawal, by contacting the Data Protection Officer at privacy@uninsubria.it or by updating one's profile in the ESSE3 system.

The legal basis for the processing, pursuant to Article 6(1)(e) of the GDPR and Article 2-sexies, paragraph 2 of Legislative Decree No. 196/2003, as amended, is the necessity to perform tasks carried out in the public interest in which the Data Controller is vested.

As a primary institution for higher education and research, it operates in implementation of Article 33 of the Constitution, Article 6 of Law No. 168/1989, as amended, and the Statute of the University of Insubria, published in the Official Gazette (GURI) on March 31, 2012, No. 77.

With regard to non-EU citizens and refugees, the University operates in implementation of Presidential Decree No. 394 of August 31, 1999, and Law No. 722 of July 24, 1954, "Ratification and implementation of the Convention relating to the Status of Refugees, signed in Geneva on July 28, 1951."

With regard to students with disabilities, the University operates in implementation of Law No. 104 of February 5, 1992, Law No. 170 of October 8, 2010, and Ministerial Decree of July 12, 2011, "Guidelines on specific learning disorders."

Pursuant to the legislation referred to in this paragraph, processing of sensitive data indicated at the time of submission of the admission application must also be considered lawful even without consent, for the purpose of accessing support tools, admission procedures, and the conduct of examinations and teaching activities, pursuant to Article 9(2)(g) of the Regulation.

The legal basis for processing, pursuant to Article 6(1)(b), (c) and (f) of the GDPR, may also be the necessity to perform a contract to which the data subject is a party or to carry out pre-contractual measures at the request of the data subject, the necessity to comply with a legal obligation to which the Data Controller is subject, and the legitimate interest of the Controller in improving the services offered.

4. Processing Methods

Data collection is carried out in accordance with the principles of lawfulness, fairness, relevance, completeness and non-excessiveness.

Personal data are processed in compliance with legal principles using tools that allow recording and storage and in such a way as to ensure security and full confidentiality.

Specific security measures are implemented to prevent data loss, unlawful use or unauthorized access, in accordance with Article 32 GDPR.

5. Data Retention Period

Personal data relating to identity and academic records are retained indefinitely, including for historical purposes, in accordance with legal archiving requirements.

Documents relating to admission tests (questions and answers) are retained for 5 years. Other documentation is retained according to the University's retention policies.

6. Recipients or Categories of Recipients of the Data to Whom the Data May Be Disclosed or Who May Become Aware of Them as Data Processors or Authorized Persons

The data processed for the purposes indicated above will be disclosed or in any case made accessible to employees and collaborators assigned to the competent offices of the University of Insubria and to lecturers of the degree programme duly authorized to process such data pursuant to Article 29 of the Regulation.

The University may also disclose the personal data under its control to other public administrations where these need to process them for procedures within their institutional competence, as well as to all those public entities to whom disclosure is mandatorily required, where the relevant conditions are met, by EU provisions, laws, or regulations.

In particular:

- Members of examination boards
- Ministry of University and Research (MUR)
- Certifying administrations, for the purpose of verifying self-declarations made pursuant to Presidential Decree No. 445/2000
- Local authorities, for the purpose of granting benefits to specific categories of students; the State Attorney's Office, the Ministry of Foreign Affairs, Police Headquarters, and Italian diplomatic representations abroad, in relation to residence permits or the recognition of specific statuses
- Affiliated healthcare institutions (ASST Sette Laghi and ASST Lariana)
- Judicial authorities (Italian Criminal Code and Code of Criminal Procedure)
- Private entities, at the request of the data subject, for the purpose of confirming the existence of qualifications
- General practitioners where the internship required for the State examination is carried out

The management and storage of the personal data collected are carried out at the University and/or by service providers necessary for technical and administrative management who, solely for the purpose of providing the requested service, may become aware of the personal data of the data subjects and are appointed as Data Processors pursuant to Article 28 of the GDPR.

The external Data Processors are:

- **CINECA Interuniversity Consortium**, provider of the ESSE3 system, with registered office at Via Magnanelli 6/3 – 40033 Casalecchio di Reno (BO)
- **CISIA – Interuniversity Consortium for Integrated Access Systems**, with registered office at Via Giuseppe Malagoli 12 – 56124 Pisa
- **OVERTURE SERVICE S.r.l.**, provider of contact center services, with registered office at Via Enrico Fermi 3 – 58020 Scarlino (GR)
- **SELEXI S.r.l.**, provider of admission testing services for restricted-access degree programmes, with registered office at Via Gerolamo Vida 11 – 20127 Milan

The complete and up-to-date list of Data Processors is available upon simple request at the Data Controller's premises.



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7. Data Transfer Abroad

For international programmes (e.g. Double Degree, Erasmus), reference is made to specific information notices.

8. Data Subject Rights

These are the rights that may be exercised against the **University of Insubria (Data Controller)**:

- the right to access one's personal data and all the information referred to in Article 15 of the GDPR
- the right to rectification of inaccurate personal data and completion of incomplete data
- the right to erasure of one's personal data, except for those contained in records that the University is required to retain by law, and unless there are overriding legitimate grounds for continuing the processing
- the right to restriction of processing where one of the conditions set out in Article 18 of the GDPR applies
- the right to object to the processing of personal data, without prejudice to the necessity and mandatory nature of processing for the establishment of the relationship
- the right to withdraw consent given for optional data processing, without affecting the lawfulness of processing based on consent before its withdrawal

To exercise these rights, the data subject may contact the Data Protection Officer by sending a request via email to: privacy@uninsubria.it

9. Complaints

The data subject also has the right to lodge a complaint with the **Italian Data Protection Authority** (www.garanteprivacy.it) or with the supervisory authority of the EU Member State in which the data subject habitually resides or works, or of the place where the alleged infringement occurred, in relation to processing considered to be non-compliant.

10. Mandatory or Optional Provision of Data

The provision of data for the purposes referred to in sections 3.1, 3.2, 3.3 and 3.4(a) is **mandatory**; therefore, any refusal to provide such data will make it impossible to access the selection procedure, proceed with enrollment, manage the academic career and receive services.

The provision of data for the purposes referred to in section 3.4(b) is **optional**; however, refusal to provide such data will result in the inability to access support tools for admission procedures to degree programmes and for the conduct of examinations and teaching activities.

11. Authorization for Data Communication (Art. 96 Privacy Code)

Consent for processing activities requiring explicit authorization must be managed independently through the user profile in the ESSE3 system.