
Privacy Notice on the Processing of Personal Data

addressed to candidates for admission tests, enrolled students, graduates and diploma holders of all degree programmes, master's programmes, specialisation courses, advanced and lifelong learning courses, PhD programmes, State professional qualification exams, students in international mobility, and applicants for and assignees of university accommodation

pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR) and Italian Legislative Decree No. 196 of 30 June 2003 (Italian Personal Data Protection Code)

This English translation is provided for information purposes only. In the event of any discrepancy, the Italian version shall prevail.

This notice is provided by the University of Foggia (hereinafter the «University» or the «Controller») pursuant to Articles 13 and 14 GDPR to the following categories of data subjects:

- candidates for admission tests and admission procedures;
- students enrolled in bachelor's, master's and single-cycle degree programmes, master's programmes, specialisation courses, advanced and lifelong learning courses, and PhD programmes;
- graduates, diploma holders and qualification holders, also after the end of their academic career;
- candidates for the State exams qualifying for the practice of regulated professions;
- incoming and outgoing international mobility students;
- members of the student's household, whose data are obtained from the student or from the INPS (Italian National Social Security Institute) database for the purposes of tuition fees and the right to university education.

1. Data Controller

The Data Controller is the University of Foggia, with registered office at Via Gramsci No. 89/91, 71122 Foggia, Italy, represented by its Rector pro tempore as legal representative. Contacts: certified e-mail (PEC) protocollo@cert.unifg.it ; e-mail rettorato@unifg.it .

2. Data Protection Officer (DPO)

The Data Protection Officer can be contacted on any matter relating to the processing of personal data and the exercise of rights at the following addresses: e-mail dpo@unifg.it ; PEC rpd@cert.unifg.it .

3. Categories of personal data processed

3.1 Common personal data

- **Personal and identification data:** first name, surname, date and place of birth, sex, tax code, citizenship, details and copy of the identity document where required for identification purposes, photograph for the university card and for identification at examinations.
- **Residence and contact data:** residence, domicile, personal e-mail address (also used for credential recovery), telephone number.
- **Residence permit data:** residence permit or visa and, where declared by the data subject, international protection status, to the extent necessary for the enrolment of third-country nationals.
- **Academic career data:** qualifications and previous academic careers, university career, exams, credits, language skills, admission test results, mobility periods, internships, qualifications obtained.
- **Economic data:** ISEE (Equivalent Economic Situation Indicator) for benefits relating to the right to university education, information contained in the DSU (Single Substitute Declaration), household

composition, payment data, IBAN where the data subject requests payments (refunds, grants, remuneration for student collaborations).

- **Credentials and data on the use of digital services:** user ID, credentials, access logs to the University's services.

3.2 Special categories of data (Article 9 GDPR)

The University processes special categories of data only where strictly necessary to provide a service or measure requested by the data subject or to comply with a legal obligation, and in particular:

- **data concerning health:** disability, specific learning disorders (SLD), pregnancy, maternity and paternity, for the purposes of inclusion measures, compensatory and dispensatory tools, fee reductions and statutory protections; fitness assessments and health surveillance data for internships and activities in laboratories or healthcare facilities;
- **data revealing gender identity,** processed solely at the request of the data subject for the activation of an alias career and for the management of the resulting changes to personal records;
- **data revealing religious beliefs,** only where they emerge from documentation submitted by the data subject to obtain a specific benefit or recognition.

The University does not collect data revealing racial or ethnic origin. Citizenship and residence permits are processed as common data and are not used for purposes other than the administrative purposes indicated.

3.3 Personal data relating to criminal convictions and offences (Article 10 GDPR)

Data relating to criminal convictions, offences or related security measures may be processed only in the cases provided for by law or regulation pursuant to Article 2-octies of the Code, for example to verify the admission requirements for State exams, to manage the careers of students serving criminal sentences under agreements with the Prison Administration, to check self-certifications (Article 71 of Presidential Decree No. 445/2000) and to fulfil obligations towards the judicial authorities.

3.4 Data of household members

For the purposes of determining tuition fees and access to right-to-study benefits, the University obtains from the INPS database the ISEE, the household composition and the information contained in the DSU, pursuant to Prime Ministerial Decree No. 159 of 5 December 2013, to the extent relevant to those purposes. Household members' data are not used for any other purpose.

3.5 Data of persons exercising parental responsibility

Where the data subject is a minor, the personal data of the persons exercising parental responsibility or guardianship may also be processed, where necessary for establishing and managing the relationship with the minor and for complying with applicable legal requirements.

4. Source of the data

Data are mainly collected from the data subject. Where they are not collected from the data subject (Article 14 GDPR), they come from the following sources:

- INPS, ISEE and DSU database, for tuition fees and the right to university education;
- Ministry of University and Research, National Register of Students and Graduates, and other ministerial information systems;
- Secondary schools and other universities, in Italy and abroad, for entry qualifications, previous careers and transfers;
- Partner universities and institutions in international mobility programmes;
- Certifying administrations, in the context of checks on self-certifications;

- Apulia Regional Agency for the Right to University Education (ADiSU Puglia), for grant and accommodation beneficiary status;
- host organisations and companies, for data relating to the performance and assessment of internships;
- managers of residences and affiliated facilities, for data relating to the use of accommodation.

5. Purposes, legal bases and nature of the provision of data

Data are processed in accordance with the principles set out in Article 5 GDPR for the purposes indicated in the table below. For each purpose, the table indicates the legal basis, whether the provision of data is mandatory or optional, and the consequences of failure to provide them.

Purpose	Legal basis	Provision of data and consequences
a) Participation in admission tests and procedures, preparation and publication of rankings, teaching evaluation, online lectures and exams	Compliance with a legal obligation; Law No. 264/1999 and calls for admission	Mandatory: without the data it is not possible to take part in the procedure
b) Enrolment, registration, career management, exams, award of qualifications, certificates and diplomas	Compliance with a legal obligation; Ministerial Decree No. 270/2004; Presidential Decree No. 445/2000; University Regulations	Mandatory: without the data it is not possible to establish or continue the relationship with the University
c) Determination of tuition fees, collection, exemptions and refunds	Compliance with a legal obligation; Performance of a task carried out in the public interest; Law No. 232/2016, Article 1, paragraphs 252 et seq.; Prime Ministerial Decree No. 159/2013.	Optional for ISEE data: if not provided, the maximum fee applies. IBAN optional: necessary only for payments
d) Inclusion measures for students with disabilities or SLD, compensatory and dispensatory tools	Compliance with a legal obligation; Performance of a task carried out in the substantial public interest; Law No. 104/1992; Law No. 17/1999; Law No. 170/2010	Optional, upon request: without the data the measures cannot be provided
e) Protection for pregnancy and parenthood	Compliance with a legal obligation; Performance of a task carried out in the substantial public interest.	Optional, at the request of the data subject
f) Curricular and extracurricular internships, including at healthcare facilities; health surveillance	Compliance with a legal obligation; Performance of a task carried out in the substantial public interest; Employment, occupational safety and occupational medicine law; Legislative Decree No. 81/2008; internship agreements	Mandatory for carrying out the internship
g) IT services, institutional e-mail, teaching platforms, library services	Performance of a task carried out in the public interest	Mandatory for the use of the services
h) Incoming and outgoing international mobility	Compliance with a legal obligation; Performance of a task carried out in the public interest; Regulation (EU) 2021/817 (Erasmus+); inter-institutional agreements	Mandatory for participation in the programmes

Purpose	Legal basis	Provision of data and consequences
i) Right to university education: grants, exemptions, student collaborations, contributions	Compliance with a legal obligation; Performance of a task carried out in the public interest; Legislative Decree No. 68/2012; calls	Optional: without the data it is not possible to access the benefits
j) Management of student accommodation	Performance of a task carried out in the public interest	Mandatory for the use of the services
k) Disciplinary proceedings against students	Performance of a task carried out in the public interest; University Regulations	The processing is necessary and does not depend on the provision of data
l) Student representation	Compliance with a legal obligation; University Regulations	Mandatory for student participation in University bodies
m) Career guidance and job placement, communication of data and CVs to companies and organisations	Performance of a task carried out in the public interest; Processing of student data (Article 96 of the Code); Article 6 of Legislative Decree No. 276/2003	Optional: communication and dissemination take place only at the request of the data subject, which may be withdrawn at any time
n) Legal publicity and transparency (rankings, results, acts)	Compliance with a legal obligation; Performance of a task carried out in the public interest; Law No. 69/2009, Article 32; Legislative Decree No. 33/2013	Mandatory: the processing is necessary
o) Archiving in the public interest, historical, scientific research and statistical purposes	Performance of a task carried out in the public interest	Processing of pseudonymised or anonymised data as soon as possible
p) Administration of psycho-aptitude tests	Consent of the data subject	Optional

6. Processing methods and authorised persons

Processing is carried out using paper and electronic means, adopting appropriate technical and organisational measures pursuant to Article 32 GDPR. Data are processed by University staff and teaching staff, within the limits of their respective duties, as persons authorised and instructed pursuant to Article 29 GDPR and Article 2-quaterdecies of the Code. Special categories of data are accessible only to the staff of the offices responsible for the specific measure requested; teaching staff and committees are informed only of the measure to be applied, without the underlying health documentation.

7. Recipients of the data

To the extent necessary for the purposes indicated, data may be communicated to:

- **data processors** appointed pursuant to Article 28 GDPR, including: the provider of the career management information system; providers of e-mail services and of teaching and cloud platforms; the treasury service provider; providers of diploma printing, security, tutoring and inclusion services; accommodation managers;
- **public administrations and bodies** acting as independent controllers, where communication is provided for by law or regulation or is necessary for the performance of institutional functions pursuant to Article 2-ter of the Code: Ministry of University and Research (also for the purposes of the National Student Register), ANVUR (National Agency for the Evaluation of Universities and Research Institutes), INPS, Italian Revenue Agency, ADiSU Puglia, Regional Government, Municipalities, Police

Headquarters (Questure), Prefectures, Ministry of Foreign Affairs and diplomatic missions, INAIL (National Institute for Insurance against Accidents at Work) and accident insurers, judicial authorities, State Attorney's Office, ISTAT (Italian National Institute of Statistics) and other bodies of the National Statistical System;

- **other universities and institutions**, in Italy and abroad, for transfers, joint degrees and mobility programmes;
- **host organisations and companies** for internships, on the basis of the relevant agreements;
- **members of the committees** for admission, exams and graduation;
- **public and private companies and organisations** for career guidance and job placement purposes, **solely at the request of the data subject**.

Special categories of data and judicial data are communicated only where provided for by law, regulation or general administrative acts pursuant to Articles 2-sexies and 2-octies of the Code. Communication to the judicial authorities and to public security authorities in the cases provided for by law remains unaffected.

8. Dissemination and publication

Personal data are disseminated only in the cases provided for by law and with the safeguards indicated by the Italian Data Protection Authority (Garante per la protezione dei dati personali). In particular:

- rankings for admission tests, right-to-study procedures and accommodation are published on the University's online official notice board and website showing, instead of the name, the student ID number or an identification code, with only the necessary data, for the period required by law and in a manner that prevents indexing by search engines;
- data concerning health are never disseminated (Article 2-septies, paragraph 8, of the Code); rankings do not reveal the use of measures relating to disability or economic hardship;
- the CVs of graduating students and graduates are published on the placement portal only at the request of the data subject, which may be withdrawn at any time.

9. Transfers to third countries

Data may be transferred to non-EU countries or international organisations where necessary for international mobility to partner institutions, for the verification of foreign qualifications and for the use of IT services provided by operators established outside the Union. Transfers take place on the basis of an adequacy decision of the European Commission (Article 45 GDPR), including, for certified US providers, the EU-US Data Privacy Framework, or of appropriate safeguards pursuant to Article 46 GDPR, such as standard contractual clauses, or, failing that, within the limits of the applicable derogations under Article 49 GDPR.

10. Automated decision-making

The University does not take decisions based solely on automated processing, including profiling, which produce legal effects concerning the data subject or similarly significantly affect him or her. Rankings and tuition fees are calculated by IT procedures applying criteria predetermined by law, regulations and calls; the results are verified and approved by the competent bodies and committees, and the data subject may request their review in accordance with the applicable procedures.

11. Retention period

Category of data	Retention period or criterion
Career data, qualifications obtained, exam records	Unlimited, for archiving purposes in the public interest (Article 89 GDPR; Presidential Decree No. 445/2000; Legislative Decree No. 42/2004), in accordance with the University's Records Retention Plan and Disposal Schedule
Data of test candidates who do not enrol	From the publication of the final ranking; in the event of litigation, until its conclusion
Documentation on ISEE, tuition fees, refunds, economic benefits	10 years from the end of the relevant financial year, unless litigation is pending
Health documentation for inclusion measures	For the duration of the career; only the indication of the measure applied remains in the career records, where necessary
Copies of identity documents	For the time necessary for identification and checks, and in any case no longer than 10 years
Institutional e-mail account and mailbox	Deactivation 30 days after the end of the career, with prior notice to the data subject
Disciplinary proceedings	The final measure is recorded in the career and retained in accordance with the Disciplinary Regulations and the Disposal Schedule; in the event of final annulment or revocation, the record is deleted and the documents are retained only for the time necessary for the defence of legal claims
Placement data and CVs	Until the request is withdrawn and in any case no longer than 12 months after obtaining the qualification
Accommodation	For the period necessary to manage the procedure, any assignment and management of the accommodation, and for the time necessary to comply with legal obligations. For data relating to applicants who are not assigned accommodation, retention will be limited to the period necessary to conclude the procedure and to handle any related checks, litigation or other obligations.
IT service logs	6 months, unless needed to investigate security incidents

12. Rights of the data subject

The data subject may exercise the following rights at any time, within the limits provided for by the GDPR and the Code:

- **access** to his or her data and to information on the processing (Article 15);
- **rectification** of inaccurate data and completion of incomplete data (Article 16);
- **erasure** (Article 17), which does not apply to data whose processing is necessary for compliance with a legal obligation, for the performance of a task carried out in the public interest or for archiving purposes in the public interest, such as career data (Article 17(3));
- **restriction of processing** in the cases provided for by Article 18;
- **portability** of data, limited to the cases provided for by law (Article 20); this right does not apply to processing necessary for the performance of a task carried out in the public interest (Article 20(3));
- **objection** to processing on grounds relating to his or her particular situation (Article 21), for processing based on Article 6(1)(e); the University may continue processing where there are compelling legitimate grounds;
- **withdrawal** of the request for communication of data for placement purposes and of any consent given for optional services.

How to exercise your rights. Requests may be submitted without formalities to the Data Protection Officer (dpo@unifg.it ; PEC rpd@cert.unifg.it), or to the Controller (rettorato@unifg.it ; PEC protocollo@cert.unifg.it). A certified e-mail (PEC) account is not required. The University will respond within one month of receipt, which may be extended by two further months where necessary, taking into account the complexity of the request (Article 12(3) GDPR), and may request information to verify the identity of the requester.

Complaints. A data subject who considers that the processing infringes the applicable law may lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) (Article 77 GDPR; Article 153 of the Code), www.garanteprivacy.it, or with the supervisory authority of the Member State of his or her habitual residence or place of work, or bring proceedings before the courts (Article 79 GDPR; Article 152 of the Code).

13. Updates

This notice may be updated. The current version, with the date of the latest revision, is published at <https://www.unifg.it/it/privacy-studenti> . Substantial changes are communicated to data subjects via their institutional e-mail.

In the event of any discrepancy, conflict, or divergence of interpretation between the Italian text and the foreign language text, the Italian version shall prevail and be binding for all intents and purposes.

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