



Notice on the processing of personal data within the University of Trento Doctoral Programmes

The Regulation (EU) 2016/679 “General Data Protection Regulation” (hereinafter “GDPR”) recognizes the fundamental right of natural persons to the protection of their personal data.

Pursuant to articles 13 and 14 of the GDPR, the University of Trento provides the present notice to persons who want to participate in the selection procedures to be admitted to Doctoral Programmes, to Doctoral students and to Doctors of Philosophy (hereinafter “data subjects”).

More specific notices will be provided about particular processes, procedures and/or service provisions.

1. Data Controller

The Data Controller is the University of Trento (hereinafter “University”), legal headquarters in via Calepina, 14, 38122 Trento (Italy), emails: ateneo@unitn.it; ateneo@pec.unitn.it.

2. Data Protection Officer’s contacts

The data subjects may contact the Data Protection Officer (DPO or RPD) to have information about processing of their personal data by writing to: rpd@unitn.it.

3. Purposes of data processing and legal framework

Within its institutional activities, and in compliance with the law provisions (clause 6, par. 1, letter e) and c) of the GDPR; clauses 9, par. 2, letter g) and 10 of the GDPR, art. 2 sexies of the Legislative Decree 196/2003 and subsequent amendments, the University will process personal data of the data subjects for the following specific purposes:

- a) to manage the selection procedures to be admitted to the University Doctoral Programmes, to manage the registration procedures and related activities, included the identification of Doctoral students by their digital photos;
- b) to manage the university career till the title awarding: to offer educational activities and exam attendance (also remotely), through digital and e-learning platforms, Moodle, online communities and other tools; to manage the study plan; to register exams; to register compulsory attendance to educational activities; to register the requests to be admitted to the final examination and/or to suspend the doctoral career; to file and store career data;
- c) to manage aids and extra time during admission tests and other kind of exams, when Doctoral students ask for and when due, and to manage inclusion services into the university community;



- d) to carry out administration, accounting, financial and asset management activities related to the admission procedures, the registration to the first and subsequent years procedures, including the determination of the university contributions and taxes and the checks on the truthfulness of the self-declarations made in compliance with the DPR 445/2000;
- e) to pay the doctoral scholarship and/or other kind of financial support, and other right to study services and activities, as for example exemptions, tax relieves, etc.
- f) to provide and to use information and communication services, i.e. University email address, online collaboration platform, digital and e-learning platforms, Moodle, educational services online secretariat (Esse3), other electronic devices and sources;
- g) to manage the access to laboratories and other restricted access buildings;
- h) to use the student's institutional email address for administrative and other kind of institutional communications, and to use the student's personal email address for administrative communications (e.g. to inform about ongoing processes, to ask for helpdesk, to reset passwords, etc.);
- i) to manage the possible disciplinary processes;
- j) to manage the registrations to attend the University language courses (CLA);
- k) to manage national and international mobility programmes;
- l) to provide the orientation services (incoming, during the study career, outgoing), and the tutoring services;
- m) to manage the registrations to attend the Test center courses;
- n) to provide the University library services;
- o) to manage the part-time collaboration activities (150 ore);
- p) to provide the service of psychological counselling;
- q) to manage the registrations, if requested, to the University nursery;
- r) to apply for and manage research projects;
- s) to manage the Doctoral students' representative's election in the University governing bodies, and to carry out the related tasks;
- t) to monitor the employment situation of Doctors of Philosophy and use the data internally and to send them to the Ministry, and to send the personal data, including the data related to the employment potentials to the national Registry of Doctoral students and Doctors of Philosophy in accordance with the Ministerial Decree no. 226/2021 and subsequent amendments;
- u) to manage activities regarding the job placement (also through data communication to private, public subjects and inter-university consortia only for employment/professional aims);



- v) to manage the registration of students, who make a request for it, into the Alumni UniTrento community;
- w) to manage statistical surveys to support analyses and the improvement of educational and research activities;
- x) to manage the video surveillance of the University buildings and facilities;
- y) to apply safety and security issues in the work locations as per Legislative Decree no. 81/2008 and subsequent amendments;
- z) to use the University Research Registry (IRIS) in order to store and disseminate, also within the open access principles, the scientific creations of the authors of the University of Trento;
- aa) to publish data and to upload doctoral thesis in the institutional University repository (Unitn-eprints PhD/IRIS) and in the national central libraries of Rome and Florence, according to the national and University current law.

Within the abovementioned purposes, personal data are necessarily processed by the controller on the basis of at least one of the following lawfulness principles: Law no. 240 of 30/12/2010, and, in particular, clause 19; Ministerial Decree no. 226 of 14/12/2021, providing for the general criteria and provisions for the accreditation of locations and courses of Doctoral programmes and the criteria for the institution of Doctoral programmes by accredited bodies; University Charter and current University Regulations on Doctoral Programmes.

4. Categories of personal data concerned

Within the abovementioned purposes the following categories of personal data are processed:

- **personal data:** personal information residence and domicile addresses, contact details (institutional email address, phone number), digital picture, registration number; University career related data, even of the previous study path (including publications, participation in conferences/seminars, research periods abroad), possible data on working career, bank account, own income (e.g. Isee) and fiscal data, and the ones of family members, images (video shooting, photos); personal email address only for Doctors of Philosophy and the ones registered to the Alumni community; possible disciplinary sanctions;
- **special categories of personal data** (sensitive data): data concerning health (e.g. the ones included in the disability certificates), data concerning gender identity (e.g. gender changeover during study career), data related to racial and ethnic origin, religious or philosophical beliefs, political opinions (e.g. election procedures of Doctoral students' representatives);
- **judicial data** only when necessary to carry out the public interest activities of the Data Controller.



5. Legal basis of data processing

The personal data provision for the abovementioned purposes is a mandatory requirement for admission and registration to Doctoral programmes, the management of the academic career and to fulfil the related administrative, accounting and fiscal duties. The provision of data for the abovementioned purposes for which the data subjects can decide to take part or not in the activities, is not mandatory, but failure in providing them entails the impossibility for the data subjects to benefit from them.

6. Data source

As a rule, personal data are collected from the data subjects. In some cases, they can be obtained from other sources, i.e. public data bases (SPID, ISEE), public administrations, register of convictions, tax assistance offices.

7. Data processing methods

Personal data are processed wholly or partly in paper forms and/or by automated means by the University of Trento personnel, who is authorized to data treatment according to their tasks, in respect of lawfulness, fairness, transparency, accuracy, relevance and necessity as per art. 5, paragraph 1 of the GDPR.

The decision-making process is never based solely on automated processing.

8. Categories of recipients

In addition to all the University personnel acting for the abovementioned purposes, personal data can be disclosed to third parties (public and private) in order to correctly fulfil the mentioned purposes, within academic relationships, in performance of law, regulations and contract obligations. Third parties may be: MUR, ANVUR, ISTAT, Civil Service Department; MAECI, MEF, CUN, CINECA, Opera Universitaria, Treasurer, Trentino Trasporti, CUS Trento, insurance companies, Revenue Agency (Agenzia delle Entrate), CAF, examination boards, administrations certifying self-declarations in accordance with DPR 445/2000, Embassies, Consulates, Police (Questura); Legal Council of State (Avvocatura dello Stato), judicial authorities, Information Centre on Academic Mobility and Equivalence – CIMEA; foreign Universities and academic institutions, within agreements including the setting up of Doctoral programmes with joint, double, multiple degrees, and for co-tutelle Doctoral programmes, public and private funding bodies -based on agreements signed as per Law no. 240/2010, private entities (Italian or foreign, i.e. companies, societies, AlmaLaurea) on request by the data subjects and in any case with their prior consent, to confirm possible qualifications or requirements and/or to facilitate orientation, training and integration into the labour market. While providing services necessary to the fulfilment of the

abovementioned purposes, each entity processing personal data on behalf of the University will be appointed as Data Processor as per art. 28 of the GDPR; moreover, when the University determines the purposes and the methods of processing jointly with other subjects, agreements of co-ownership will be agreed according to clause 26 of the GDPR. In any case, personal data must be disclosed in compliance with a provision of the Authority of Public Security and/or the Judicial Authorities. Personal data may be published on the University websites in the cases provided for by law or regulations.

The Doctoral thesis must be digitally filed in the national Registry of Doctors of Philosophy and in the national libraries in Rome and Florence, pursuant to the national current law (clause 14 of Ministerial Decree no. 226/2021).

9. Transfer of personal data to non-EU countries

Within the abovementioned purposes, personal data can be transferred to non-EU countries, e.g. to universities, research institutes, public and private subjects within international mobility programmes, internships, research projects and other activities which have to be carried on out of the EU territory. This transfer will be performed within the limits and under the terms as per art. 44 and seq. of the GDPR, that is:

- when there is an adequacy decision by the EU Commission according to clause 45 of the GDPR;
- when there are appropriate Standard Contractual Clauses (SCCs) according to clause 46 of the GDPR;
- when the previous conditions are not applicable, on the basis of exceptions according to clause 49 of the GDPR, including important reasons for public interest according to clause 49, par. 1, letter d) of the GDPR.

10. Data retention period

Personal data will be stored as long as necessary to fulfil the abovementioned purposes and anyway in compliance with legal obligations and/or regulations on the matter. In any case data will be stored for the time indicated by the current law and/or by the University regulations on managing and storage of documents issued by the University within its institutional activities.

In detail:

- registration data, career data and final exam data will be stored indefinitely, considering the archiving obligations required by the existing legislation;
- data related to call for selection procedures (i.e. rankings, minutes, etc.) will be stored indefinitely;



- digital identities necessary to use ICT services will be stored indefinitely to technically manage the digital University identities;
- data related to web usage (e.g. time and duration of connection) and to usage of information systems will be stored for a maximum period of 6 months, unless otherwise provided by law;
- data collected on the basis of consent provided by the data subject to access specific services will be stored till the same withdraws his/her consent and/or asks for the service deactivation, without prejudice to the compliance of a legal obligation to their retention.

11. Rights of the data subjects

In accordance with art. 15 and seq. of the GDPR, at any time the data subjects can obtain from the controller the following:

- **right to access** his/her own personal data and other information as mentioned in art. 15 of the GDPR;
- **right to rectification** of his/her own personal data when inaccurate and/or their **integration** when incomplete;
- **right to erasure** ('right to be forgotten') of his/her own personal data, except when the University is obliged to data storage to comply with legal obligations as per art. 17, par. 3 of the GDPR;
- **right to restriction** of processing as per art. 18 of the GDPR;
- **right to object to processing** of his/her own personal data when allowed.

To exercise their rights, data subjects can use the form available on the University web page "**Privacy and data protection**" and send it to: ateneo@unitn.it; ateneo@pec.unitn.it.

This is without prejudice to the right to lodge a complaint with the Supervisory Authority in accordance with art. 77 of the GDPR or to engage in legal proceedings.

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