



PRIVACY NOTICE REGARDING ON THE PROCESSING OF DATA RELATED TO STUDENTS AT THE UNIVERSITY OF BRESCIA

pursuant to Article 13 of EU Regulation No. 2016/679 (GDPR)

In accordance with the provisions of EU Regulation 679/2016 (European General Data Protection Regulation), we are providing you with the necessary information regarding the processing of the personal data you have provided. This privacy notice is provided pursuant to Article 13 of EU Regulation 679/2016 (European General Data Protection Regulation).

	DATA CONTROLLER Pursuant to Articles 4 and 24 of EU Regulation 679/2016, the Data Controller is the University of Brescia, with its registered office at Piazza del Mercato, 15, Brescia, Tel. 03029881, email/PEC ammcentr@cert.unibs.it
	DATA PROTECTION OFFICER (DPO): Pursuant to Articles 37–39 of EU Regulation 679/2016, the University of Brescia has appointed the Data Protection Officer, which can be contacted at the email address rpd@unibs.it Further information and contact details for the DPO are available on the following web page https://www.unibs.it/en/personal-data-protection
  	TYPES OF DATA <i>Personal data means “any information relating to an identified or identifiable natural person (‘data subject’); a natural person is considered identifiable if they can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to their physical, physiological, genetic, mental, economic, cultural, or social identity.”</i> The personal data to be processed was obtained directly from the data subject. The personal data to be processed for the purposes listed below includes (by way of example and not limited to): a. a personal identification data (first name, last name, date of birth, gender), contact information (email address, cell phone number), residence and domicile information, data related to career history, participation in educational activities (attendance by date, location, and time), and data regarding academic qualifications and income status (ISEE); b. data relating to gender identity (alias); c. browsing data when using online platforms and services; d. images and video recordings taken during distance learning activities; e. special categories of data, such as data concerning health, including physical or mental health (e.g., students with disabilities, any accidents or incidents ...), data revealing racial or ethnic origin which are processed only if authorized by an express provision of law for the pursuit of purposes of significant public interest, or by consent from the data subject expressed in the context of contingent needs; f. personal data relating to criminal convictions and to the extent strictly necessary for the performance of the Data Controller’s public interest duties (e.g., data relating to students who are incarcerated, ...). It should also be noted that the data we may come into possession of, and that you provide, may also pertain to your family members.

 PURPOSE OF THE PROCESSING	 LEGAL BASIS FOR THE PROCESSING	 PERSONAL DATA RETENTION PERIOD	 NATURE OF DATA PROVISION
PURPOSE 1: Management of the academic career and provision of services - management of admission procedures for degree programs and graduate courses; - pre-enrollment and enrollment for access to degree programs and registration for educational activities, however they may be designated; - management of the academic career (including through the use of student ID cards), including the awarding of academic degrees and any other final certificates; - communications regarding administrative procedures and/or communications regarding institutional events and activities; - calculation of tuition fees and, in general, access to financial benefits (e.g., awards, scholarships, the “150- hour student” program); - management of services to facilitate the inclusion of students with specific disabilities and learning disabilities in the student community; - participation in international mobility programs (Erasmus, UNITA, etc.); - participation in calls for applications and internal selection processes for the provision of tutoring roles, student collaborations and activities related to student societies and for the organisation of cultural and social activities; - management of procedures related to the election of student representatives, including voting and the performance of duties associated with the elected office held by the student in University bodies; - handling disciplinary proceedings against students; - use of the information, telecommunications, and email services provided by the University; - organization of instruction, including distance learning (streaming, e-learning), exams, and exams for the award of academic degrees and	LEGAL BASIS 1: The processing of personal data is carried out in accordance with: - Article 6, paragraph 1, subparagraph (e) of the GDPR (performance of a task carried out in the public interest); - Article 6, paragraph 1, subparagraph (c) of the GDPR (compliance with a legal obligation). Special categories of personal data (such as data relating to health, political opinions, or religious beliefs, etc.) are processed exclusively when one of the following conditions applies: Article 9(2)(f), (g), and (j). Any processing of judicial data is carried out exclusively in the cases provided for by law.	The data collected will be recorded, processed, and retained indefinitely in accordance with the retention requirements imposed by applicable law.	Mandatory. The provision of personal data for the purposes indicated is essential for establishing and managing the relationship between the data subject and the University, for the provision of services, and for compliance with related legal obligations.

any other final certificates, as well as attendance tracking. The delivery of distance learning may involve the collection of photographs and audio-video recordings during classes; m. use of library services; n. promotion and monitoring of the physical and mental well-being of the student community and personalized support interventions—including psychological support—for academic progress, including actions and communications to combat university dropout rates and the abandonment of studies; o. use of student dining hall and/or housing services; p. access to laboratories and other secure facilities; q. organization and management of curricular and extracurricular internships, or periods of study and research, at affiliated institutions; r. activities aimed at job placement, including through the sharing of data with private and public entities and interuniversity consortia for exclusively employment- or professional-related purposes, including the organization of events to facilitate connections between students/graduates and the workforce (Career Days) and MAECI-CRUI internship grants; s. management of admission procedures for state licensing exams; t. management of claims and litigation cases; u. relations with the Treasurer and coordination for the issuance of bank cards for the disbursement of financial benefits and grants (scholarships, subsidies, etc.); v. verification of the accuracy of self-certifications submitted pursuant to Presidential Decree No. 445/2000; w. statistical surveys conducted within the University to improve services and support for students or to enhance teaching activities.			
PURPOSE 2: To enable communication with administrative offices through the ticketing system and to schedule appointments with those offices on the dedicated platform, in order to request information or assistance regarding administrative procedures, academic career management, tuition, financial aid, and	LEGAL BASIS 2: The processing of personal data is carried out in accordance with: - Article 6(1)(e) of the GDPR (performance of a	18 months from the date of the submission of the request via ticketing system/online helpdesk or appointment.	Required in order to provide the service

student services.	task carried out in the public interest); - Article 6(1)(c) of the GDPR (compliance with a legal obligation).		
PURPOSE 3: Other institutional purposes a.1 Participation in surveys and questionnaires organized by the University, even after the completion of studies; a.2 Submission of proposals to participate in research projects or other institutional activities of the University and the development of communities; b.1 Dissemination of communications regarding the University's merchandise; c.1 Dissemination of information about academic programs and informational and cultural events organized or sponsored by the University or by its teaching and research units; c.2 Communication and management of initiatives aimed at awarding scholarships, prizes, honors, and events of public interest, including through the sharing of data with public and private entities; c.3 Dissemination of activities related to fundraising for the University, including following the completion of a degree; c.4 Dissemination of initiatives organized by the Alumni Association and other associations affiliated with the University for activities and events, including following the completion of a degree; d.1 Communication activities involving the collection and processing of images (photos) and audio-video recordings of students for the creation of institutional campaigns on institutional social media channels (Facebook, Twitter, Instagram, YouTube, etc.) and across all of the University's official communication channels.	LEGAL BASIS 3: Personal data is processed in accordance with: - Article 6, paragraph 1, subparagraph (a) of the GDPR (consent of the data subject); - Article 9, paragraph 2, subparagraph (a) of the GDPR (consent of the data subject for special categories of data). Consent is collected electronically via the ESSE3 platform.	Until consent is withdrawn or revoked.	The provision of data is optional. If you choose not to provide it, the University will not be able to fulfill the purposes and opportunities indicated. In any case, refusal to provide data will not have any consequences regarding the management of your academic career.

	RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE DATA The personal data provided will be disclosed to recipients who will process the data in their capacity as independent data controllers, data processors (Article 28 of EU Regulation 679/2016) and/or as authorized individuals acting under the authority of the Data Controller and the Data Processor (Article 29 of EU Regulation 679/2016), for the purposes listed above. Internally, the data will be disclosed to faculty members of the chosen degree program and to employees and staff assigned to the relevant offices of the University of Brescia, who, in their capacity as data protection officers and/or system administrators and/or data processors, will be adequately trained for this purpose by the Data Controller.
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	In compliance with the principles of data processing and for the purposes indicated, the University may disclose the personal data it holds to third parties in connection with the fulfillment of legal and contractual obligations, specific requests from the data subject, the handling of complaints or disputes, and for the prevention and prosecution of fraud and any unlawful activity, including but not limited to: - MUR for inclusion in the National Student Registry (established by Law No. 170/2003) to monitor the progress of university students' academic careers and to perform all functions assigned by law; - The pro tempore treasury office of the University of Brescia and other financial institutions for the fulfillment of financial obligations, in particular, for the payment and reimbursement of tuition fees and the disbursement of grants and financial benefits, including through the use of student ID cards; - The Region, other accredited or authorized public and private entities, and potential employers for the purposes of career guidance and entry into the workforce; - Partner organizations where students complete internships; - Insurance companies with agreements with the University; - Ministry of Foreign Affairs, Police Headquarters, Embassies, and the Public Prosecutor's Office regarding residence permits and the recognition of special statuses; - Private entities, public bodies, and interuniversity consortia (e.g., Almalaurea, Cineca, etc.) for the purposes of placement, internships, study, research, and the University's "third mission"; - Health authorities and public safety authorities; - Associations, foundations, and other entities with agreements with UNIBS for institutional purposes related to university activities; - Other public entities, including international ones, for the performance of the University's institutional functions; - External entities designated as Data Processors; - Alumni Association; - Occupational physician; - Social media platforms used by the University for institutional and communication purposes. For degree programs that involve access to healthcare facilities and hospitals, the data will be disclosed to the hospital system and other affiliated public or private entities.
	DATA TRANSFER TO A THIRD COUNTRY Your personal data may be transferred outside the European Economic Area (EEA) for the purpose of carrying out the University's institutional functions, such as: - Internships or job placements with non-EU organizations or companies; - Other universities abroad, upon request, in the case of study programs involving international mobility to countries outside the EEA; - Authorities abroad, upon request, if it is necessary to verify academic credentials for professional reasons or for the continuation of studies. Furthermore, transfers outside the EEA will occur when the data subject consents to the dissemination of their image and/or audio-video recordings on the University's social media platforms in accordance with the current policy. In such cases, the transfer will take place under the terms and conditions set forth by those platforms (e.g., Facebook, Instagram, YouTube, LinkedIn, etc.). The Data Controller hereby guarantees that transfers outside the EEA will only be made to third countries for which there is an adequacy decision by the European Commission (Art. 45 GDPR) or to third countries that provide one of the safeguards deemed adequate pursuant to Art. 46 of the GDPR, or, in exceptional cases, based on the derogations provided for in Art. 49(1) of the GDPR.
	ADDITIONAL INFORMATION Online Services and Platforms The personal email address, any phone number provided by the individual, and the institutional email address assigned at the time of enrollment or registration are the means

	through which all communications and information regarding academic progress and the pursuit of all stated objectives will be sent. Access to the online platforms and services provided by the University is granted via SPID and/or institutional credentials provided by the University and protected by the centralized access control system, always using the same set of credentials (username and password) generated for managing the University email account (@studenti.unibs.it). Distance Learning The University uses digital unified communication platforms and specific platforms for managing instruction (Teams and Moodle). These platforms are also used to deliver distance learning for courses where it is authorized. When using these platforms, the University adheres to the principle of data minimization, processing only the personal data strictly necessary to achieve educational purposes, without conducting any investigations into the private lives of the data subjects. Publication. Outside the educational community (instructors and students enrolled in the course), the publication or distribution of video recordings that include images or video contributions from participants is permitted only with the documented consent of the individuals concerned, whose dignity, honor, and reputation must be respected in all cases. In any case, publication is limited to educational, cultural, and non-profit. purposes.
	RIGHTS OF DATA SUBJECTS You may exercise your rights as set forth in Articles 15 et seq. of EU Regulation 679/2016 by contacting the Data Controller or writing to the DPO at rpd@unibs.it. You have the right, at any time, to request access to your personal data, as well as its rectification, erasure/right to be forgotten, restriction, or to object to its processing. Furthermore, you have the right to data portability. You have the right to withdraw your consent at any time without affecting the lawfulness of processing based on consent prior to withdrawal. Without prejudice to any other administrative or judicial remedies, if you believe that the processing of your personal data violates the provisions of EU Regulation 679/2016, pursuant to Article 15(f) of the aforementioned EU Regulation 679/2016, you have the right to file a complaint with the Italian Data Protection Authority (Supervisory Authority www.garanteprivacy.it). Detailed procedures for exercising your rights as a data subject are available on the website https://www.unibs.it/en/personal-data-protection . This privacy notice will be published in the list visible on the Personal Data Protection page of the University Portal.
	CHANGES TO THE PRIVACY POLICY The data controller reserves the right, at its sole discretion, to change, modify, add to, or remove any part of this Privacy Policy at any time in order to bring it into compliance with the GDPR and to meet transparency obligations. To make it easier to check for any changes, the following will be indicated below, if applicable: changes to the purpose of processing, changes to the identity of the data controller, changes to the manner in which data subjects may exercise their rights regarding processing, the date of the update, or the version of the Privacy Policy.