



UNIVERSITÀ  
DEGLI STUDI  
FIRENZE

## **STUDENTS' PRIVACY POLICY**

**Information for the processing of personal data of users who intend to enroll in the courses study and of students, undergraduates, graduates, scholarship holders, postgraduates and doctoral students of the University of Florence**

To all concerned subjects

We wish to inform you that the General Data Protection Regulation (EU Regulation 2016/679 of the European Parliament and Council of 27 April 2016), from now on GDPR, concerning the protection of persons with regard to the processing of Personal Data, provides for the protection of individuals with regard to processing of personal data as a fundamental right.

According to article 13 of the GDPR, therefore, we must inform you that:

### **DATA CONTROLLER**

The data controller of your personal data is the University of Florence, located in Florence, Piazza San Marco, 4 - phone 055 27571 - email [urp@unifi.it](mailto:urp@unifi.it), pec: [ateneo@pec.unifi.it](mailto:ateneo@pec.unifi.it).

### **DATA PROTECTION OFFICER**

The Data Protection Officer (RPD) is Mr. Massimo Benedetti, Director of the General and Legal Affairs Department, Florence, via G. la Pira, 4 - phone. 055 2757667 - email: [privacy@adm.unifi.it](mailto:privacy@adm.unifi.it).

### **PURPOSES OF THE PROCESSING AND LEGAL BASIS**

In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance and necessity as per art. 5, paragraph 1 of the GDPR the University of Florence, as Data Controller, will process the personal data supplied by you and concerning you or your family members at the time of your enrolment, during your academic career, or processed by the University exclusively for the purposes of carrying out the institutional duties of public interest proper of the Controller.

In particular, the data you provide will be collected and processed, using manual, paper and electronic methods, and will be entered in paper and/or electronic archives for the educational and administrative management of your academic career and for the following purposes:

- a) enrollment and attendance of university courses delivered face-to-face and in e-learning mode;
- b) management of the university career;
- c) management of curricular and extra-curricular internships;
- d) calculation of the amounts of fees and charges due;
- e) achievement of the qualification title;
- f) use of telematic and e-mail services;
- g) use of library services;

- h) access to laboratories and other protected facilities;
- i) correspondence relating to your university academic career;
- l) application of safety measures in the workplace according to the provisions of Legislative Decree no. 81/2008;
- m) disciplinary procedures for students;
- n) surveys for the evaluation of teaching and for customer satisfaction;
- o) archiving and retention of data concerning the university career (studies, positions held, qualifications obtained);
- p) elections of students' representatives and possible fulfillment of the duties concerning the elected office held by the interested party in the University governing bodies;
- q) outgoing orientation and job placement activities;
- r) access to grants, aids and services related to the right to university study;
- s) historical and scientific statistics and research, on aggregated or anonymous data, with no possibility of identifying the user.

#### **DATA CATEGORIES FOR THE CALCULATION OF FEES AND CHARGES DUE**

In accordance with article 14 of the GDPR, we inform you that for the purposes indicated under letter d) **calculation of the amount of fees and charges due**, the University of Florence, in order to determine said amount will have to acquire the ISEU value, the composition of your family unit, as well as all the information you disclosed to the DSU, provided that they are relevant and not redundant for the same purpose, directly from the INPS database in application of the D.P.C.M. 5 December 2013, n.159.

#### **SPECIAL DATA CATEGORIES**

For the data processing purposes indicated above, in specific situations, the University can collect and process, on request of the user, particular categories of data such as:

- racial and ethnic origin (for non-EU citizens, and for refugee status);
- health conditions (in case of pregnancy or for disabled students);
- judicial data (for detained users and students);
- gender orientation (in case of any gender assignment rectification).

#### **CATEGORIES OF DATA USERS AND POSSIBLE DATA DISCLOSURE**

The data processed for the purposes mentioned above will be communicated or will in any case be accessible to the teaching staff affiliated with the chosen study programme and employees and collaborators assigned to the competent offices of the University of Florence, who, in their capacity as data protection officers and/or system administrators and/or persons in charge of processing, will be adequately trained for this purpose by the Controller.

The University can disclose the personal data under its control to other public administration offices if these must process the data for any proceedings falling under their own institutional competence as well as to all those public entities to which, in the presence of the relevant prerequisites, the communication is mandatory according to EU provisions, laws or regulations, in

addition to insurance companies for any insurance claims.

For the performance of its institutional tasks of public interest, the University can disclose the personal data in its possession to other public entities that manage the provision of research grants and/or scholarships that promote studies and research, projects for academic development and right to university study services.

For the study paths that entail access to health and hospital facilities, the data will be disclosed to the competent Health Authority.

The management and conservation of personal data collected by the University of Florence takes place on servers located within the University and/or on external servers provided by of suppliers of a number of services necessary for the technical-administrative management of data. Such suppliers, for the sole purpose of the requested service, may have access of your personal data and, in such cases, they will be duly appointed as Data Processors pursuant to art. 28 of the GDPR. The data collected, for the pursuit of some of the above mentioned institutional purposes (ex: traineeships or job placement at non-EU institutions / companies), may have to be disclosed to a country outside of the European Union (so-called third country).

The Data Controller assures that the extra-EU data disclosure will take place only to third countries where there exists a decision of the adequacy by the European Commission (art.45 GDPR) or towards third countries that provide one of the guarantees indicated as adequate by the art.46 of the GDPR.

#### **DATA CONSERVATION PERIOD**

Personal data collected for the use of services and for communication purposes will be kept for the time established by current legislation or by University Regulations as per its conservation rule book.

Data concerning any disciplinary measures that you incurred in will be kept indefinitely as regards to the final ruling and for 5 (five) years in case of revocation or cancellation of the ruling.

#### **YOUR RIGHTS**

In your capacity as an interested party, you have the right to request from the University of Florence, as the data controller, pursuant to articles 15, 16, 17, 18, 19 and 21 of the GDPR:

- access to personal data and to all the information referred to in article 15 of the GDPR;
- correction of incorrect personal data and the integration of incomplete personal data;
- cancellation of personal data, except for those contained in documents that must be compulsorily kept by the University and unless there is a legitimate overriding reason to proceed with the processing;
- the limitation of processing where one of the hypotheses referred to in article 18 of the GDPR occurs.

You have also have the right

- to oppose the processing of personal data, without prejudice to what is necessary with regard to the need and compulsory treatment for the purpose of establishing the relationship;
- to revoke any consent given for non-mandatory data processing, with no prejudice to the lawfulness of the process based on the consent given before the revocation.

### **HOW TO EXERCISE YOUR RIGHTS**

You may exercise all the above rights by sending an e-mail to the Data Protection Officer at the following e-mail address [privacy@adm.unifi.it](mailto:privacy@adm.unifi.it).

### **COMPLAINTS**

In your capacity as an interested party, you also have the right to lodge a complaint with the Guarantor Authority for the protection of personal data pursuant to art.77 of the GDPR.

### **OBLIGATORINESS FOR DATA PROVISION**

The provision of personal data for the purposes referred to in subparagraphs a) to q) is obligatory to allow the establishment of the relationship between the students and the university.

The provision of sensitive personal data for the purposes referred to in letter r) is optional. In the case, however, that you refuse to provide your personal data, the Administration cannot guarantee the benefits provided by the law during the competitive examinations.

The process referred to in letter s), does not provide for the application of the GDPR since it applies to aggregate or anonymous data.

*Updated to June 2018*