ANNEX III
PRIVACY POLICY ACCORDING TO GENERAL DATA PROTECTION REGULATION ART. 13 (EU REGULATION 679/2016 AND COUNCIL OF 27 APRIL 2016)

The University of Turin would like to remind students that personal data acquired during their applications or subsequently will be processed for academic and research purposes as per its privacy policy concerning Erasmus Mobility. This is in compliance with general principles of lawfulness, correctness, transparency, limitation of purposes and period of storage, minimisation of data, accuracy, integrity, confidentiality and accountability, the Code on protecting personal data and University regulations implementing the Code and on sensitive and judicial data (see www.unito.it, "Statute and Regulations", "Regulations: procedures").

In accordance with Art. 13 of EU Regulation 2016/679 (hereafter GDPR), the following information is provided in compliance with the principle of transparency and to inform students of data processing characteristics and methods:

   a) Identity and contact data
   The "Data Owner" is the University of Turin (hereafter University), with its registered offices in Via Verdi 8 - 10124 Torino (contact details: pec address: ateneo@pec.unito.it - email address: rettore@unito.it: the legal representative: Chancellor pro tempore).

   b) DPO contact data
   The University Data Protection Officer (DPO) can be contacted at: rpd@unito.it.

   c) Purpose for processing and legal basis
   The requested data is processed in compliance with the principles of lawfulness, correctness, transparency, limitation of the purposes and retention period, minimisation of data, accuracy, integrity, confidentiality and accountability as referred to in GDPR Art. 5.

The University is the Data Owner that processes the common personal data (point 3 (a)) which students provide and which refer to them or their family. It is pursuant to GDPR Art. 6 par. 1 and in accordance with the law, the Constitution and internal regulations as "processing is necessary for work of public interest or connected to the Data Owner’s public powers". The above data will be collected and processed in paper or digitalised format suitable for institutional purposes under EU Regulation No 1288/2013 of the European Parliament and Council 11/12/2013, published in the European Union’s G.U. regarding policies in fields of education, training, youth and sport ie Erasmus Plus and by Law No. 170 of 11 July 2003, which established the "Fund for the Support of Young People and Promote Student Mobility" (FGMS), for:

   1) managing student profiles (from enrolment to graduation), sending relevant communications and storing and archiving all related documentation concerning the Erasmus experience;
2) managing under-graduate and graduate internships;
3) applying safety measures at work in accordance with Legislative Decree 81/2008;
4) statistical surveys and historical and scientific research (in aggregate and anonymous form);
5) listening to and supporting students in need;
6) managing support activities for students with disabilities or specific learning disabilities;
7) University communications for administrative, educational and research purposes (e.g. reporting seminars, events and conferences);
8) providing facilities, scholarships and grants and other services related to the right to university study.

The University calculates student benefits directly from INPS (D.P.C.M. 5 December 2013, No.159) concerning annual household income (ISEEU) values and family details as well as all relevant information that the student provided in their DSU application and in accordance with point 8 (GDPR Art 14).

This data will be published in the "Transparent Administration" section on the university portal together with all information for students who are eligible and in accordance with the single text on Transparency Law 33 (2013).

Certain categories of personal data ie racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as genetic and biometric data intended to identify a natural person, data relating to health or sexual life or orientation of that person and personal data relating to criminal convictions and crimes or related security measures can be collected and processed, (GDPR Art. 9 and 10) for the purposes of processing this information in specific situations.

d) Providing data
Students must provide the requested data on their application for the Erasmus Mobility call for study in order to be assessed. Failure to provide this data will mean the student will not be admitted to the Mobility programme and the related procedure will not be complete.

e) Categories who have access to personal data
This data will be communicated or at least accessible to teaching and other staff working in the relevant University offices and, as Data Protection Officers and/or system administrators and/or authorised for processing, they will receive suitable training for this purpose from the Data Owner.

As Data Owner, the University could provide personal data to other public bodies if it is needed for institutional procedures as well as other public subjects in certain conditions, communication is mandatory under EU measures, legal rules or regulations, as well as insurance companies for accident policies.

The University manages and stores personal data on its own servers as well as its providers’ servers as part of services which are necessary for internal technical-administrative management. These providers could consequently become aware of University users’ personal data while carrying out their duties as "Data Controllers" in accordance with GDPR Art. 28.
The data may be communicated to the following categories of recipients:

1) Ministry of Education, University and Research – MIUR
2) Erasmus+ National Agency INDIRE;
3) European Commission within the framework of international Mobility programmes;
4) National registry of students and graduates;
5) Ministry of Foreign Affairs, Embassies, Prefectures, Police, regarding the recognition of certain statuses;
6) Public Prosecutor's Office, State Attorney's Office for the management of litigation and disciplinary proceedings;
7) Certifying bodies regarding replacement declarations (DPR. No. 445/200);
8) Other Italian and foreign universities, regarding transfers to and from these universities;
9) Higher education partners on student Mobility programmes;
10) Public and private bodies and others that manage research funding and/or scholarships or that promote studies and research, projects for university development;
11) Regional Body for the Right to University Study (Piedmont) which manages services for the right to study (scholarships, residences, canteens);
12) Intesa Sanpaolo – University partner bank that collects tuition fees and pays scholarships;
13) Interuniversity Consortium for Automatic Calculation – CINECA, for insolvency procedures (applications for bonuses and scholarships), management and maintenance of student related applications;
14) Other private partners who support insolvency management and examinations as per previous point.
15) Alma Laurea Interuniversity Consortium, for surveys on graduate profiles and employment status;
16) Insurance companies for accident policies, civil liability;
17) Public or private organisations for employment, cultural, recreational and sporting purposes;

f) Data transfer to third countries

The data collected might also have to be transferred to a non-EU country (so-called third country) for any of the above mentioned institutional purposes. The Data Controller assures that non-EU transfers of data will only be to those third countries following a European Commission (GDPR Art.45) adequacy decision or to those third countries that provide one of the guarantees that GDPR Art.46 recognised as adequate. For example, Google for Education is recognised an as appropriate guarantee measure. See the University website’s Privacy Section on Google’s Privacy and Security policies. These services involve the transfer of personal data to a non-EU third country via Google’s "cloud" solutions.

g) Data archiving periods

Personal data concerning a student’s university profile (eg personal data, qualifications, intermediate and final exam results, eligibility status, notes, etc.) will be kept indefinitely as to comply with the independent requests for certification or assessment and in compliance with current legislation on archiving obligations. Contact data ie telephone number, personal e-mail are kept for the period necessary for the purposes the data was collected for and after which the University will no longer use them.
h) Data rights
In accordance with GDPR Articles 15, 16, 17, 18, and 21, students can exercise the following rights, regarding their personal data:

1) access rights to personal data and all information (Art.15);
2) right to rectification of inaccurate personal data or supplement incomplete data (Art.16)
3) right to be forgotten (Art.17) concerning personal data except that which the University must keep by law and in accordance with point f) or which the University has a compelling legitimate reason to keep for purposes of public interest;
4) right to restricting data processing (Art.18) where the Data Owner can only use data when necessary or mandatory in order to be able to provide certain services;
5) right to data portability (law only applies to digitalised data), as per Art. 20;
6) right to object to one’s personal data being processed (Art.21) including profiling.

The right to object, however, is not relevant when the University’s role as Data Controller has the legal obligation to process the data in the public interest or as part of its duties as a public authority. Students can always exercise their rights concerning their data (access, rectification, integration, etc.) according to Art. 7 of Legislative Decree 196/2003, by writing to the Data Controller: Directorate for Institutional Activities, Programming, Quality and Evaluation, via Verdi 8 - 10124 Torino or by email: internationalexchange@unito.it or telephone: 011.6704425.

i) Complaints
Should the University not respond to a user’s request, they can make a complaint under GDPR Article 77 by contacting the GDPR watchdog for the Protection of Personal Data at: garante@gpdp.it; website: www.garanteprivacy.it) or through judicial appeal in accordance with Article 78 of the GDPR.

j) Different processing purposes
If the Data Controller intends to process personal data for a purpose other than the reason it was collected for, they must provide detailed information as to their objectives and any other relevant information before proceeding.

k) Profiling
The owner does not use automated processes aimed at profiling.