



## ANNEX II - PRIVACY POLICY ACCORDING TO GENERAL DATA PROTECTION REGULATION ART. 13 AND 14 (EU REGULATION 679/2016 AND COUNCIL OF 27 APRIL 2016)

**PLEASE NOTE:**

The present English version is provided for information purposes only.  
In the case of conflicting meanings between the two versions,  
the Italian version prevails.

The University of Turin would like to inform Erasmus+ Mobility candidates that their personal data acquired during or after their application will be processed for academic and research purposes. 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](http://www.unito.it), "Statuto e Regolamenti", "Regolamenti: procedimenti").

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

### 1. Data Owner and contact details

The Data Owner is the University of Turin whose legal representative is the Chancellor (*pro tempore*) with registered offices in Via Verdi 8 - 10124 Torino and who can be contacted at: [ateneo@pec.unito.it](mailto:ateneo@pec.unito.it). email address: [rettore@unito.it](mailto:rettore@unito.it). Tel: 011.6706111.

### 2. Data Protection Officer and contact details

The University of Turin Data Protection Officer (DPO) can be contacted at: [rpd@unito.it](mailto:rpd@unito.it).

### 3. Purpose for processing and legal basis

The requested personal data is processed in the public interest or related to public authority duties as per Art. 6, par. 1, lett. e) of EU Regulation 2016/679 for the following purposes:

- managing student profiles (from enrolment to graduation), sending relevant communications and storing and archiving all related documentation concerning the Erasmus+ experience;
- managing under-graduate and graduate internships;
- statistical surveys and historical and scientific research (in aggregate and anonymous form);
- listening to and supporting students in need;
- managing support activities for students with disabilities or specific learning needs;
- University communications for administrative, coursework and research purposes (e.g. reporting seminars, events and conferences);
- 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 as mentioned above in Point 7 (GDPR Art 14).

This data will be published in the section “Amministrazione Trasparente” (UniTo website) as well as on the University website together with the eligible candidate list and in accordance with the single text on Transparency Law 33 (2013).

For the purposes mentioned above and in specific situations, certain categories of personal data i.e. the ones related to criminal convictions and offences or related to security measures, can be collected and processed (GDPR Art. 10).

#### 4. Types of data processed

The Data Owner collects and processes the following types of personal data for reasons mentioned above:

- personal details;
- contact details;
- ISEE/ISEE equivalent/ GDP per capita PPP data;
- university career history.

The Data Owner collects and processes personal data of a particular category (above) as per Art. 9 of EU Regulation no. 2016/679 ie:

- health data in support of Mobility for people with special needs.

#### 5. Providing data

Students must provide the requested data in their application for the Erasmus+ Mobility Call for studies in order for their application to be assessed. Failure to do so will mean the student cannot be admitted to the Mobility programme and the related procedure will not be complete.

#### 6. Processing methods

Processing personal data methods include manual, computerised and online tools which are suitable to ensure the data's security and confidentiality.

The data is processed internally by authorised University staff working under the Data Owner's responsibility who have received suitable training for this purpose.

#### 7. External third-party processing

The data could also be shared with and processed externally by third parties who are providers of certain services necessary during processing, acting on behalf of the Data Owner and for the sole purpose of providing support. They are duly appointed "Data processors" in accordance with Art. 28 of EU Regulation 2016/679.

#### 8. Categories of recipients of personal data

In compliance with current legislation, personal data will be shared with the following categories of recipients:

- Ministry of Education, University and Research – MUR;
- Erasmus+ National Agency INDIRE;
- European Commission within the framework of international Mobility programmes;
- National registry of students and graduates;
- Ministry of Foreign Affairs, Embassies, Prefectures, Police, regarding the recognition of certain statuses;
- Public Prosecutor's Office, State Attorney's Office for the management of litigation and disciplinary



proceedings;

- Certifying bodies regarding replacement declarations (DPR. No. 445/200);
- Other Italian and foreign universities, regarding transfers to and from these universities;
- Higher education partners on student Mobility programmes;
- Public and private bodies and others that manage research funding and/or scholarships or that promote studies and research, projects for university development;
- Regional Body for the Right to University Study (Piedmont) which manages services for the right to study (scholarships, residences, canteens);
- Intesa Sanpaolo – University partner bank that collects tuition fees and pays scholarships;
- Interuniversity Consortium for Automatic Calculation – CINECA, for competition procedures (applications for bonuses and scholarships), management and maintenance of student related applications;
- Other private partners who support competition management and examinations as per previous point;
- Alma Laurea Interuniversity Consortium, for surveys on graduate profiles and employment status;
- Insurance companies for accident policies, civil liability;
- Public or private organisations for employment, cultural, recreational and sporting purposes;
- Health Agencies for courses providing access to health and hospital facilities.

This data will be shared with 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.

### **9. Data transfer to third countries**

The University has third party suppliers which support it in its duties (above). For example, Google for Education is recognised as an 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.

### **10. Data archiving periods**

Personal data concerning a student's university profile (eg personal details, qualifications, intermediate and final exam results, eligibility status, notes, etc.) will be kept indefinitely so as to comply with independent requests for certification or assessment and in compliance with current legislation on archiving obligations. Contact details ie telephone number and personal e-mail are kept for the period necessary for the purposes the data was collected and after which the University will no longer use them.

### **11. Data rights**

Interested parties (or data subjects) can exercise their rights concerning personal data (Art. 15-21 of EU Regulation 2016/679) where applicable, against the University of Turin by sending a request to [internationalexchange@unito.it](mailto:internationalexchange@unito.it) and putting "privacy rights" in the subject line.

### **12. Complaints**

Interested parties should be aware that they have the right to lodge a complaint with the supervisory authority and contact the Guarantor Authority for the protection of personal data (see: [www.garanteprivacy.it](http://www.garanteprivacy.it)).



### 13. Profiling

The owner does not use automated processes aimed at profiling.