

## INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA FOR THE UNISANNIO APP

### Pursuant to Art. 13 of EU Regulation 2016/679 (GDPR)

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, with registered office at Piazza Guerrazzi, 1, (82100), Benevento. Tel. +390824305081; Tax Code: 01114010620; E-mail: segreteria.rettore@unisannio.it; PEC: amministrazione@cert.unisannio.it.
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer can be reached at the following e-mail address: dpo@unisannio.it.

### Purposes and Legal Basis (Art. 6 GDPR)

Purpose	Legal Basis
a) Registration, authentication, and management of the user account on the App.	Performance of a task carried out in the public interest ( <b>Art. 6.1.e</b> )
b) Provision of the digital student card and enablement of related services (access to facilities, libraries, canteens, discounts, agreements).	Performance of a task carried out in the public interest ( <b>Art. 6.1.e</b> )
c) Sending communications and push notifications regarding events, initiatives, institutional notices, and university career updates.	Performance of a task carried out in the public interest ( <b>Art. 6.1.e</b> )
d) Management of registrations for events organized by the University.	Performance of a task carried out in the public interest ( <b>Art. 6.1.e</b> )
e) Aggregate and anonymous statistical analysis of App usage to improve functionality.	Performance of a task carried out in the public interest ( <b>Art. 6.1.e</b> )
f) Sending personalized communications on events, training opportunities, and services based on user preferences.	Performance of a task carried out in the public interest ( <b>Art. 6.1.e</b> )
g) Fulfillment of legal obligations and compliance with orders from public authorities.	Legal obligation ( <b>Art. 6.1.c</b> )
h) Ascertaining responsibility in case of hypothetical cybercrimes against the App or its users.	Legal obligation ( <b>Art. 6.1.c</b> )

- **MANDATORY NATURE OF DATA PROVISION:** Providing personal data for the listed purposes is mandatory to establish the relationship between the student and the University.
- **PROCESSING METHODS:** The Unisannio Mobile App allows students to stay updated on university events and access the student card for additional services. Processing is carried out using IT and electronic tools designed to ensure security and confidentiality, in full compliance with **Art. 32 of the GDPR**.
- **RECIPIENTS AND DATA TRANSFER:** Data may be shared with:

- Authorized internal University staff (faculty, technical-administrative staff).
  - **Data Processors (Art. 28 GDPR):** Technological service providers (e.g., Cineca, cloud infrastructure providers, App developers).
  - **Partner entities:** Libraries, canteens, sports facilities, and businesses offering student discounts via the digital card.
  - Public administrations or Judicial/supervisory authorities where required by law.
  - *Note:* Data will not be disseminated. Transfers outside the EU will only occur under an adequacy decision (Art. 45 GDPR) or with explicit consent.
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## Cookies and Technical Tracking Technologies

The App uses strictly **technical cookies** and equivalent technologies (session tokens, local storage, cache files).

- **Strictly Necessary:** Required for authentication and the digital student card.
- **Functional:** Stores preferences like language or notification settings.
- **Anonymized Analytics:** Collects aggregate data on App performance.
- **Prohibited:** The App **does not** use profiling cookies, advertising tracking, or third-party commercial tracking.

**User Control:** Users can clear local data via device settings (*Settings > Applications > Unisannio > Storage > Clear Data/Cache*) or by uninstalling the App. Disabling session cookies will prevent the use of authenticated features.

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## Data Retention Period

- **Account and Student Card Data:** For the duration of the app installation and/or the student-University relationship.
  - **Technical/Navigation Data (logs):** For a maximum of **12 months**.
  - **Cybercrime Investigation Data:** For the duration necessary for relevant legal procedures.
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## Rights of the Data Subject

Users hold the following rights:

- **Access:** To receive information about their processed data.
- **Rectification:** To correct inaccurate or incomplete data.
- **Erasure (Right to be Forgotten):** To request data deletion under specific legal conditions.
- **Restriction:** To limit processing if data accuracy is contested.
- **Objection:** To oppose processing based on legitimate interests, unless prevailing legal grounds exist.

- **Complaint:** To lodge a complaint with the **Italian Data Protection Authority** (*Garante per la Protezione dei Dati Personali*) or the competent Judicial Authority.

**How to exercise your rights:** Requests can be sent to the Controller or the DPO using the contact details provided above or via the form available at: <https://www.unisannio.it/it/ateneo/amministrazione/privacy>.