

## **University of Sannio**

### **Information on the Processing of Personal Data**

The University of Sannio, aware of the importance of personal data protection, undertakes to process data in compliance with the principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity, confidentiality, and accountability.

The University of Sannio is actively engaged in adapting to new regulatory obligations to ensure compliance with the **GDPR**. In this context, a dedicated Working Group has been established, coordinated by the **Data Protection Officer (DPO)**, to support University structures and staff in GDPR compliance activities, bringing together technical-IT, legal, organizational, and administrative expertise.

The following notices represent a requirement under **Regulation (EU) 2016/679 – General Data Protection Regulation (GDPR)**, which, pursuant to Art. 13, provides for the obligation to provide data subjects with information regarding the processing of their personal data.

Below are listed the main information notices on the processing of personal data carried out by the University of Sannio, including through automated tools and web applications:

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### **Macro-categories**

#### **Competitions and Selections**

1. Notice provided to participants in competitions and selections for various reasons issued by the University of Sannio;
2. Notice for the processing of personal data of candidates for selection procedures for participation in international mobility programs;

#### **Teaching and Technical-Administrative Staff and Collaborators**

3. Notice for the processing of personal data of teaching and technical-administrative staff;
4. Notice for technical-administrative staff with a subordinate employment contract;
5. Notice for the processing of personal data in the socio-welfare sector;
6. Notice for the processing of personal data for the health and safety of persons in the workplace;

#### **Orientation**

7. Notice for the use of the Orientation/Counseling Service;
8. Notice for the processing of personal data for users utilizing orientation, internship, and job placement services;

#### **Students**

9. Notice for the processing of personal data of students, graduating students, graduates, scholarship holders, and PhD students intending to matriculate/enroll in degree courses, PhDs, masters, training courses, and individual courses at the University of Sannio;
10. Notice for the processing of personal data of students with disabilities or SpLD (Specific Learning Disorders) intending to access tutoring, assistance, and social inclusion services;

11. Notice for the processing of personal data acquired in the event of an accident report involving students, employees, and collaborators;
12. Notice for disciplinary proceedings against students;
13. Notice for the provision of services and activities for the right to study;
14. Notice for the processing of personal data of students during lectures at the University;

#### **Third Parties and Placement**

15. Notice for the processing of personal data for users utilizing orientation, internship, and job placement services;

#### **Website**

16. COOKIE POLICY;
17. Notice on the processing of personal data within the University portal system sites;

#### **Economic Operators and Suppliers of Works, Goods, and Services**

18. Notice for processing aimed at the purchase of goods and services and the stipulation of contracts;
19. Notice for the processing of personal data of economic operators interested in participating in contractor selection procedures, suppliers of goods and services, works contracts, and concessions;
20. Notice on the processing of personal data for suppliers;
21. Notice on the processing of personal data for the registration procedure in the list of economic operators;

#### **Services – Space Management**

22. Notice for the processing of personal data in the context of email services and collaboration tools;
23. Notice for data processing in the library sector;
24. Notice for the processing of personal data aimed at fundraising, institutional communication/information, and community development;
25. Notice for the processing of personal data for welfare policies and the use of benefits;
26. Notice for the processing of personal data in the context of fixed and mobile telephony services;
27. Notice on the processing of personal data regarding the service for converting digital documents into accessible formats;
28. Notice for the processing of personal data in the context of space management;

#### **Video Surveillance System**

29. Notice for the processing of personal data for video surveillance systems installed at the University of Sannio facilities;

#### **Events, Communications, and Multimedia Material**

30. Notice for the processing of personal data for the creation of promotional and informative video and multimedia material; Release form for the use of portrait/audio-video recordings;

#### **Post-Graduate Training**

31. Notice for enrollment in a Master's program;

32. Notice for enrollment in a PhD program;

**Evaluation of Scientific Research and Teaching**

33. Notice for the processing of personal data to ensure the monitoring and evaluation of research;

34. Notice for the processing of personal data necessary for managing research projects;

35. Notice for statistical surveys and teaching evaluation;

**Institutional Bodies and Offices**

36. Notice for the processing of personal data for the management of institutional bodies and offices.

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## Specific Notice: Competitions and Selections

### Information Notice

Provided to participants in competitions and selection processes issued for various reasons by the University of Sannio.

The General Data Protection Regulation (EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016), hereinafter GDPR, and Legislative Decree no. 196/2003 and subsequent amendments and additions ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, and Articles 6 (paragraph 1), 9, and 10 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, in the person of the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C. (Certified Email): [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Individuals participating in competitions and selection processes issued for various reasons by the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity referred to in Art. 5, paragraph 1 of the GDPR, the University of Sannio, as Data Controller, shall process the personal data provided voluntarily at the time of the application for participation in competitions and selections. This is for purposes related to the performance of institutional tasks in the public interest with which the Data Controller is vested. The data provided are processed for the management of the competitive or selective procedure, for the eventual assignment of the position or recruitment, and for the management of ranking lists (where provided for in the call).

Processing may include sensitive data (e.g., health status and disability, judicial data, etc.). The processing of this data is required by the rules governing selections (e.g., to provide suitable support to candidates with disabilities, to verify personal requirements, etc.). Specifically, processing is intended to ascertain the existence of the requirements for participation (qualifications, CV) and the absence of factors preventing participation (judicial data).

Candidates' personal data are processed by the members of the selection board (commission), the administrative offices in charge of the selection procedures, and those in charge of formalizing recruitment and assignments.

Data are processed with or without the aid of electronic tools. In the latter case, IT systems are equipped, in accordance with Chapter IV of Regulation (EU) 2016/679, with security measures to prevent data loss, unlawful or incorrect use, and unauthorized access (e.g., profiling of database access authorizations).

The management of data on paper (e.g., applications) involves specific organizational security measures communicated to the boards, to be adapted to specific cases (e.g., keeping applications under lock and key, archiving them in University archives, non-disclosure of information).

The University may automatically acquire certain information to verify the declarations submitted by candidates (e.g., requests for criminal record checks; confirmation of educational qualifications from schools/universities; requests for family status from municipalities).

- **MANDATORY OR OPTIONAL NATURE OF DATA PROVISION:** The provision of personal data for the aforementioned purposes is mandatory for participation in the selection/competitive procedure.
- **CATEGORIES OF DATA RECIPIENTS AND DATA TRANSFER:** Data will be communicated or accessible to employees and collaborators assigned to the competent offices of the University of Sannio who, as persons in charge of processing, will be appropriately instructed. The University may communicate personal data to other public administrations if they must process them for proceedings within their institutional competence, as well as to all public entities to which communication is mandatory by law or regulation.

Personal data management and storage occur on servers located within the University and/or on external servers of service providers necessary for technical-administrative management. These providers may become aware of personal data only for the purpose of the requested service and will be duly appointed as Data Processors under Art. 28 of the GDPR. Collected data will not be transferred to non-EU countries.

- **DATA RETENTION PERIOD:** Personal data related to participation in the procedure will be stored for the time established by current legislation or the University Regulation. Regarding data in IT systems, it will be kept for a period not exceeding the achievement of the purposes, with specific regard to the principle of storage limitation (Art. 5, letter e).
- **RIGHTS OF THE DATA SUBJECT:** The data subject has the right to request from the University of Sannio (Data Controller), pursuant to Arts. 15, 16, 17, 18, 19, and 21 of the GDPR:
  - Access to their personal data and all information in Art. 15;
  - Rectification of inaccurate data and integration of incomplete data;
  - Erasure of their data (except for documents that must be compulsorily kept by the University and unless a prevailing legitimate reason exists);
  - Restriction of processing under Art. 18.

The data subject also has the right:

- To object to processing (without prejudice to the mandatory nature of data needed for services);
  - To withdraw consent for non-mandatory processing, without affecting the lawfulness of processing based on consent before its withdrawal.
- **EXERCISE OF RIGHTS:** The data subject may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by sending a request to the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or the P.E.C. addresses provided.
  - **COMPLAINT:** The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (Garante) pursuant to Art. 77 of the GDPR ([www.garanteprivacy.it](http://www.garanteprivacy.it)).

## Information Notice

For the processing of personal data of candidates for selection procedures for participation in international mobility programs.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter GDPR, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code"), following Law no. 101 of 10 August 2018, provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Candidates for selection procedures for participation in international mobility programs promoted by the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, and necessity (Art. 5 GDPR), the University will process personal data provided voluntarily to manage selection procedures and the administrative phases (preparation, execution, and closure) of international mobility periods.
  - **Legal Basis:** The processing is necessary for the performance of a task carried out in the public interest (Art. 6, para. 1(e) and, for special categories of data, Art. 9, para. 2(g) of the GDPR).
  - Specifically for mobility programs, the University operates in compliance with EU Regulation 1288/2013 establishing "Erasmus+".
- **SPECIFIC PURPOSES OF PROCESSING:**
  - Verifying requirements and the absence of factors preventing participation;
  - Determining scores and ranking positions;
  - Managing credit recognition for studies completed abroad;
  - Managing curricular and extracurricular internships (Erasmus+ Traineeship);
  - Calculating international mobility grant amounts;
  - Disciplinary proceedings involving students;
  - Use of IT services, email, and access to labs/protected facilities;
  - Processing health data (for students/staff with disabilities) to access additional funding or support measures at host institutions;
  - Workplace safety measures (Leg. Decree 81/2008);
  - Archiving university career data and statistical surveys (anonymous/aggregated);
  - Communicating contact details to other students upon explicit request.

- **RECIPIENTS AND DATA TRANSFER:** Data will be accessible to University staff and professors. The University may also communicate data to other public administrations or entities where mandatory by law, including:
  - Erasmus+ National Agency (Italy) and the European Commission;
  - Ministry of Education, University and Research (MIUR) and ADISU;
  - Universities and research institutions in EU/EEA member states or extra-EU countries;
  - Local authorities, Ministry of Foreign Affairs, Police Headquarters (*Questure*), and Embassies/Consulates;
  - Public or private "enterprises" (for Erasmus+ Traineeships).
  - International Transfers: Data transferred to EU countries follow GDPR principles. Transfers to non-EU countries will be protected under Chapter V of the GDPR. Private entities like insurance companies, travel agencies, or residential facilities may also receive data.
- **DATA RETENTION PERIOD:** Personal details, ranking lists, and official minutes are stored indefinitely in accordance with legal archiving obligations for university records.
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15-21 of the GDPR, you have the right to request:
  - Access to your data and related information;
  - Rectification of inaccurate data or integration of incomplete data;
  - Erasure of data (unless the University is legally obligated to keep it);
  - Restriction of processing.
  - Right to Object: You may object to processing, though this may prevent the use of offered services. You may also withdraw consent for non-mandatory processing.
- **EXERCISE OF RIGHTS:** You may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
- **COMPLAINT:** You have the right to lodge a complaint with the Italian Data Protection Authority (*Garante*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

For the processing of personal data of teaching and technical-administrative staff.

Personal data provided at the time of establishing the employment relationship with the University, during its course, or upon its termination—relating to the data subject and/or their family members—are processed in accordance with the General Data Protection Regulation (EU Regulation 2016/679 - GDPR) and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code").

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, in the person of the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Teaching and technical-administrative staff in service at the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** The University processes personal data exclusively for the fulfillment of legal requirements related to the employment relationship, including tax and social security obligations.
  - **Processed Data Includes:**
    - **Personal details:** Name, date/place of birth, tax code (*codice fiscale*), residence, citizenship, ID document, CV, and bank details.
    - **Family data:** Composition of the family unit and details of individual members.
    - **Career data:** Previous careers and selection procedure results.
    - **Special categories (Art. 9 GDPR):** Racial/ethnic origin (for non-EU citizens/refugees) and health status (for protected categories under Law 68/1999).
    - **Judicial data (Art. 10 GDPR):** Data relating to criminal convictions or offenses that may result in dismissal from public administration.
- **SPECIFIC PURPOSES:**
  - **Contractual:** HR management, payroll, career progression, training (including e-learning), leave/mobility management, disciplinary proceedings, and use of IT/library services.
  - **Legal Obligations:** Workplace safety (Decree 81/2008), verification of declarations, fitness for service checks, and archiving of teaching registers.
  - **Public Interest/Legitimate Interest:** Evaluation of teaching/research quality and anonymous statistical surveys.
- **MANDATORY NATURE:** Providing data is mandatory. Refusal to provide data will prevent the finalization of the recruitment/employment procedure.
- **RECIPIENTS AND DATA TRANSFERS:** Data may be accessed by authorized University staff. It may also be communicated to external public and private entities for administrative or legal reasons, including:

- **Social Security/Tax:** INPS, INDAP, and INAIL.
  - **Government:** MIUR (Ministry of Education), ANVUR, and the Presidency of the Council of Ministers.
  - **Health:** Competent health facilities for medical/tax visits.
  - **Legal/Employment:** Judicial authorities, Employment Centers (*Centri per l'impiego*), and the Territorial Labor Directorate.
  - **Transparency:** Certain data will be published online in the "Transparent Administration" section of the University website as required by Legislative Decree 33/2013.
  - **International Transfers:** Data may be transferred to foreign universities or international organizations for research or mobility. Transfers to non-EU countries are governed by adequacy decisions or appropriate safeguards (Arts. 46, 47, or 49 GDPR).
- **DATA RETENTION PERIOD:** \* Contractual measures: For the duration of the relationship.
    - **Disciplinary proceedings:** Indefinitely for the final definitive provision; 5 years if the provision is revoked or canceled.
    - **Legal/Public interest:** For the duration provided by applicable laws or for historical interest.
  - **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15-21 of the GDPR, you have the right to request access, rectification, erasure (unless legally restricted), and restriction of processing. You may also object to processing or withdraw consent for non-mandatory activities.
  - **EXERCISE OF RIGHTS:** Submit requests to the DPO via email at [dpo@unisannio.it](mailto:dpo@unisannio.it) or use the form available at: <https://www.unisannio.it/it/ateneo/amministrazione/privacy>.
  - **COMPLAINT:** You have the right to lodge a complaint with the Data Protection Authority (*Garante per la protezione dei dati personali*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

For the processing of personal data of teaching and technical-administrative staff.

Personal data provided at the time of establishing the employment relationship with the University, during its course, or upon its termination—relating to the data subject and/or their family members—are processed in accordance with the General Data Protection Regulation (EU Regulation 2016/679 - GDPR) and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code").

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

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- **CATEGORIES OF DATA SUBJECTS:** Teaching and technical-administrative staff in service at the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** The University processes personal data exclusively for the fulfillment of legal requirements related to the employment relationship, including tax and social security obligations.
  - **Processed Data Includes:**
    - **Personal details:** Name, date/place of birth, tax code (*codice fiscale*), residence, citizenship, ID document, CV, and bank details.
    - **Family data:** Composition of the family unit and details of individual members.
    - **Career data:** Previous careers and selection procedure results.
    - **Special categories (Art. 9 GDPR):** Racial/ethnic origin (for non-EU citizens/refugees) and health status (for protected categories under Law 68/1999).
    - **Judicial data (Art. 10 GDPR):** Data relating to criminal convictions or offenses that may result in dismissal from public administration.
- **SPECIFIC PURPOSES:**
  - **Contractual:** HR management, payroll, career progression, training (including e-learning), leave/mobility management, disciplinary proceedings, and use of IT/library services.
  - **Legal Obligations:** Workplace safety (Decree 81/2008), verification of declarations, fitness for service checks, and archiving of teaching registers.
  - **Public Interest/Legitimate Interest:** Evaluation of teaching/research quality and anonymous statistical surveys.
- **MANDATORY NATURE:** Providing data is mandatory. Refusal to provide data will prevent the finalization of the recruitment/employment procedure.
- **RECIPIENTS AND DATA TRANSFERS:** Data may be accessed by authorized University staff. It may also be communicated to external public and private entities for administrative or legal reasons, including:

- **Social Security/Tax:** INPS, INDAP, and INAIL.
  - **Government:** MIUR (Ministry of Education), ANVUR, and the Presidency of the Council of Ministers.
  - **Health:** Competent health facilities for medical/tax visits.
  - **Legal/Employment:** Judicial authorities, Employment Centers (*Centri per l'impiego*), and the Territorial Labor Directorate.
  - **Transparency:** Certain data will be published online in the "Transparent Administration" section of the University website as required by Legislative Decree 33/2013.
  - **International Transfers:** Data may be transferred to foreign universities or international organizations for research or mobility. Transfers to non-EU countries are governed by adequacy decisions or appropriate safeguards (Arts. 46, 47, or 49 GDPR).
- **DATA RETENTION PERIOD:** \* Contractual measures: For the duration of the relationship.
    - **Disciplinary proceedings:** Indefinitely for the final definitive provision; 5 years if the provision is revoked or canceled.
    - **Legal/Public interest:** For the duration provided by applicable laws or for historical interest.
  - **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15-21 of the GDPR, you have the right to request access, rectification, erasure (unless legally restricted), and restriction of processing. You may also object to processing or withdraw consent for non-mandatory activities.
  - **EXERCISE OF RIGHTS:** Submit requests to the DPO via email at [dpo@unisannio.it](mailto:dpo@unisannio.it) or use the form available at: <https://www.unisannio.it/it/ateneo/amministrazione/privacy>.
  - **COMPLAINT:** You have the right to lodge a complaint with the Data Protection Authority (*Garante per la protezione dei dati personali*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

For the processing of personal data in the socio-welfare sector.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter GDPR, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
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- **CATEGORIES OF DATA SUBJECTS:** Individuals in service at the University of Sannio who benefit from socio-welfare services.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** Data collection is performed in compliance with the principles of lawfulness, fairness, relevance, completeness, and non-excess in relation to the purposes for which they are processed. The University of Sannio, as Data Controller, shall process the personal data provided by the data subject following the use of socio-welfare services.
  - **Data subject to processing include:**
    - Personal, identification, and contact details (name, surname, date and place of birth, tax code, residence, citizenship, matriculation number for students and technical-administrative staff), identity document, contact info, degree course (for students), bank account details, vehicle license plate;
    - Special categories of data (Art. 9 GDPR), regarding the health status or medical conditions of the data subject;
    - Specific data related to the socio-welfare service (e.g., medical reports, certificates).
  - **Legal Basis:** Data are collected and processed for purposes based on the public interest for the correct provision of benefits and services within the health and welfare sector provided by law, as well as for the performance of the contractual relationship.
- **MANDATORY NATURE OF DATA PROVISION:** The provision of personal data for the aforementioned purposes is necessary.
- **RECIPIENTS AND DATA TRANSFER:** Processed data will be communicated or accessible to employees and collaborators assigned to the competent offices of the University of Sannio, authorized pursuant to Art. 29 of the Regulation. Management and storage occur within the University and/or at service providers necessary for technical-administrative management, appointed as Data Processors under Art. 28 GDPR. Data will not be disseminated. No data transfers abroad are envisaged.
- **DATA RETENTION PERIOD:** Personal data are stored for the time necessary to achieve the purposes related to the fulfillment of the socio-welfare relationship and to comply with storage obligations

provided by civil, accounting, tax, and regulatory laws. At the end of the retention period, data will be deleted or anonymized.

- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15, 16, 17, 18, 19, and 21 of the GDPR, the data subject has the right to:
  1. Request access to their personal data.
  2. Request the rectification of inaccurate data or the integration of incomplete data.
  3. Request the erasure of personal data (under the conditions of Art. 17, para. 1 GDPR and subject to the exceptions in para. 3) and the restriction of processing (under Art. 18, para. 1 GDPR).
  4. Withdraw consent at any time, limited to cases where processing is based on consent for specific purposes.
  5. Lodge a complaint with the Supervisory Authority (Garante Privacy).
- **EXERCISE OF RIGHTS:** The data subject may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by sending a request to the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
- **COMPLAINT:** The data subject has the right to lodge a complaint with the Italian Data Protection Authority (*Garante*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### For the processing of personal data for the health and safety of persons in the workplace.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

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- **CATEGORIES OF DATA SUBJECTS:** Technical-administrative and teaching staff in service at the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity referred to in Art. 5, paragraph 1 of the GDPR, the University of Sannio, as Data Controller, shall process the personal data provided. Furthermore, personal data are processed by the **competent physician** in order to carry out mandatory health surveillance activities for staff, complying with legal obligations as defined by **Legislative Decree 81/08** (Consolidated Act on Health and Safety at Work) and **Legislative Decree 230/95**.
- **CATEGORIES OF PERSONAL DATA:** The data processed by the system are as follows:
  1. Personal data and **special categories of personal data** (data regarding health status, medical reports);
  2. Identification data, contact details, data regarding health status, data regarding work activities performed, and career data.
- **RECIPIENTS AND DATA TRANSFER:** In relation to the data necessary for the aforementioned purposes, personal data will be processed by the designated University structures and employees (Prevention, Protection, and Safety Office; Personnel Office).
- **DATA RETENTION PERIOD:** Data will be stored by the University of Sannio, in accordance with the principles of Art. 5 of Regulation (EU) 2016/679, for a period of time not exceeding the achievement of the purposes. Specifically, retention periods are strictly dependent on the management areas (e.g., health file/medical reports/administrative management) and the regulations currently in force in those areas.
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15, 16, 17, 18, 19, and 21 of the GDPR, the data subject has the right to:
  1. Request access to their personal data.
  2. Request the rectification of inaccurate data or the integration of incomplete data.
  3. Request the erasure of personal data concerning them (upon the occurrence of one of the conditions indicated in Art. 17, para. 1 of the GDPR and in compliance with the exceptions

provided for in para. 3 of the same article) and the restriction of processing (under the circumstances indicated in Art. 18, para. 1 of the GDPR).

4. Withdraw consent at any time, limited to instances where processing is based on consent for one or more specific purposes.
  5. Lodge a complaint with the Supervisory Authority (Garante Privacy, <http://www.garanteprivacy.it>).
- **EXERCISE OF RIGHTS:** The data subject may exercise all the above rights (including by using the specific form published on the page <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by sending a request to the Data Protection Officer at the e-mail address [dpo@unisannio.it](mailto:dpo@unisannio.it) or to the P.E.C. addresses [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
  - **COMPLAINT:** The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (*Garante*) pursuant to Art. 77 of the GDPR (<https://www.garanteprivacy.it>).

## Information Notice

### For the use of the Orientation/Counseling Service.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Individuals (e.g., students) who utilize the Orientation/Counseling service.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity referred to in Art. 5, paragraph 1 of the GDPR, the University of Sannio, as Data Controller, shall process the personal data provided within the scope of activities for the management/monitoring of individual progress, orientation counseling, and support for individual planning regarding their university studies.
  - Data will be processed specifically and individually for the purpose of:
    - Ensuring constant attention to the outcomes of the orientation process and the university career, supporting its "essential" phases;
    - Activating direct communication channels (e.g., individual interviews) in the event of specific needs or in cases of risk or university dropout;
    - Data in **aggregated form** will also be processed to study and disseminate internal institutional models and practices, exchange information and experiences, and trigger a process of monitoring and evaluating the quality of teaching.
- **CATEGORIES OF PERSONAL DATA:** The data processed by the system include:
  1. First name, last name, qualification, and tax code of the data subjects.
  2. Email address and contact details.
  3. **Health data** relating to students with a certified disability.
- **RECIPIENTS AND DATA TRANSFER:** In relation to the data necessary for the aforementioned purposes, the processing of personal data by the University structures and employees is carried out exclusively for institutional purposes and in line with the relevant legislative and regulatory provisions. For these purposes only, data may also be communicated to:
  1. Certifying administrations, when verifying self-declarations submitted pursuant to DPR no. 445/2000;
  2. Judicial authorities (Criminal Code and Code of Criminal Procedure);

3. University personnel for research or teaching activities aimed at analyzing potential service improvements, in a form that does not allow the direct identification of the data subject;
  4. Private entities, at the request of the data subject, to confirm the existence of any qualifications/certifications;
  5. Public and private entities (Foundations, Associations, companies, etc.) for the management of the University's own institutional activities (pursuant to Art. 4 of D.R. 271/2009, the General University Statute, University regulations, and current legislation).
- **DATA RETENTION PERIOD:** Data will be stored by the University of Sannio, in accordance with the principles of Art. 5 of Regulation (EU) 2016/679, for a period of time not exceeding the achievement of the purposes and with specific regard to the principle of storage limitation.
  - **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15, 16, 17, 18, 19, and 21 of the GDPR, the data subject has the right to:
    1. Request access to their personal data.
    2. Request the rectification of inaccurate data or the integration of incomplete data.
    3. Request the erasure of personal data concerning them (upon the occurrence of the conditions in Art. 17, para. 1 GDPR and subject to the exceptions in para. 3) and the restriction of processing (under Art. 18, para. 1 GDPR).
    4. Withdraw consent at any time, where processing is based on consent for specific purposes.
    5. Lodge a complaint with the Supervisory Authority (Garante Privacy).
  - **EXERCISE OF RIGHTS:** The data subject may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by sending a request to the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or to the provided P.E.C. addresses.
  - **COMPLAINT:** The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (*Garante*) pursuant to Art. 77 of the GDPR (<https://www.garanteprivacy.it>).

## Information Notice

### For the processing of personal data of users of orientation, internship, and job placement services.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Users (e.g., students) utilizing the orientation, internship, and job placement services activated at the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** Data collection and processing are carried out in compliance with the principles of lawfulness, fairness, relevance, completeness, and non-excess. The University of Sannio processes data such as:
  - **Personal and contact details:** Name, surname, date/place of birth, tax code, residence, citizenship, contact info.
  - **Educational career data:** School attended / reference institution.
  - **Special categories of data (Art. 9 GDPR):** Health status (for students with disabilities and/or specific learning disabilities - SLD/DSA) to access specific support tools.

### Processing Activities:

- Registration for orientation events and participation in mock tests or individual counseling.
- Sending notifications regarding orientation initiatives or new courses.
- Improving orientation activities and reducing dropout rates via personalized paths (**Legal basis: Public Interest, Art. 6.1.e GDPR**).
- Activation of curricular, training, and orientation internships.
- In-itinere orientation and career guidance activities.
- Placement activities (**Legal basis: Consent**).
- Consultation with social partners regarding the University's educational offerings.
- Stipulation of contracts and agreements.

For promotional communications via email, mobile, or mail, the legal basis is **consent**. Providing data for legal obligations or public interest is **mandatory** to use the services; refusal results in the inability to provide requested services. Statistical processing uses anonymous or aggregated data and falls outside the GDPR.

- **RECIPIENTS AND DATA TRANSFER:** Data will be accessible to University staff or authorized third parties (tutors, orientation offices, disability services, psychological counseling, private companies, public entities, the *AlmaLaurea* database, etc.). These entities may act as **Data Processors** (Art. 28 GDPR) or as independent Data Controllers. Data may be communicated to public authorities when required by law.
- **DATA RETENTION PERIOD:** Data will be archived and stored for a **maximum of 10 years**. This period is based on the maximum duration of a university career for an individual data subject.
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15-21 of the GDPR, you have the right to:
  - **Access** your personal data and information.
  - **Rectify** inaccurate data or integrate incomplete data.
  - **Erase** data (Right to be forgotten), except for documents the University is legally required to keep.
  - **Restrict** processing under the conditions of Art. 18 GDPR.
  - **Object** to processing (without prejudice to mandatory processing required for the relationship).
  - **Data Portability**, where technically feasible.
  - **Withdraw consent** at any time for non-mandatory processing.
- **EXERCISE OF RIGHTS:** You may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
- **COMPLAINT:** You have the right to lodge a complaint with the Italian Data Protection Authority (*Garante per la protezione dei dati personali*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

**For the processing of personal data of students, graduating students, graduates, scholarship holders, and PhD students intending to matriculate or enroll in degree courses, PhD programs, Masters, training courses, or single courses at the University of Sannio.**

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Students, graduating students, graduates, scholarship holders, and PhD students intending to enroll in courses at the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, and transparency (Art. 5 GDPR), the University will process personal data provided voluntarily at the time of matriculation or enrollment, data relating to family members, or data collected from third parties (e.g., INPS) for the performance of institutional tasks in the **public interest**.
  - **Specific Purposes:**
    - Matriculation, enrollment, and attendance of courses (in-person and e-learning);
    - Management of the university career (including international mobility and double degrees);
    - Management of curricular and extracurricular internships;
    - Calculation of tuition fees and achievement of the degree;
    - Use of IT services, email, library services, and access to laboratories;
    - Workplace safety measures (Leg. Decree 81/2008) and disciplinary proceedings;
    - Teaching evaluation, customer satisfaction surveys, and student representative elections;
    - **Job placement and outbound orientation** (subject to explicit **consent**);
    - Access to benefits and services related to the "Right to Study" (scholarships, etc.);
    - Statistics and scientific/historical research (on anonymous/aggregated data).
- **MANDATORY NATURE OF DATA PROVISION:** Providing personal data for purposes "a" through "s" (except for "q" - job placement) is **mandatory** to establish the relationship between the student and the University.

- **CALCULATION OF TUITION FEES:** To apply fee reductions or benefits (point "d"), the University will directly acquire ISEU-ISEE values and family composition data from the **INPS database**, pursuant to D.P.C.M. 159/2013.
- **SPECIAL CATEGORIES OF DATA:** In specific situations, the University may process:
  - Racial or ethnic origin (for non-EU citizens/refugees);
  - Health status (for pregnancy or disability support);
  - Judicial data (for incarcerated students);
  - Sexual life (for gender reassignment records).
- **RECIPIENTS AND DATA TRANSFER:** Data will be accessible to professors and University staff. It may also be communicated to:
  - Other public administrations, insurance companies, or entities managing research grants/scholarships;
  - Health authorities (Azienda Sanitaria) for medical-related courses;
  - EU university institutions for mobility or double degrees (governed by GDPR);
  - **Non-EU countries:** Transfers will only occur if an **adequacy decision** exists (Art. 45 GDPR) or with your **explicit consent**.
  - Technical service providers (e.g., Cineca, Cisia) appointed as **Data Processors** (Art. 28 GDPR).
- **DATA RETENTION PERIOD:** \* University career data: **Stored indefinitely** due to legal archiving obligations.
  - Disciplinary proceedings: Indefinitely for the final act; 5 years if revoked/canceled.
  - Service/communication data: For the time established by current regulations.
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15-21 of the GDPR, you have the right to request access, rectification, erasure (unless legally restricted), and restriction of processing. You also have the right to object to processing or withdraw consent for non-mandatory activities.
- **EXERCISE OF RIGHTS:** You may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
- **COMPLAINT:** You have the right to lodge a complaint with the Italian Data Protection Authority (*Garante*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### **For the processing of personal data of students with disabilities or SLD (DSA) intending to access tutoring, assistance, and social inclusion services.**

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Students with disabilities or Specific Learning Disorders (SLD/DSA) who intend to access tutoring, assistance, and social inclusion services.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** Data collection and processing are carried out in compliance with the principles of lawfulness, fairness, transparency, relevance, and necessity (Art. 5 GDPR). The University of Sannio, as Data Controller, shall process the personal data provided by the data subject—concerning the data subject themselves and/or their family members—at the time of enrollment or during their educational path, exclusively for purposes related to the performance of institutional tasks in the **public interest**.
  - **Specific Purposes:**
    1. Provision of services to support students with disabilities in traveling to and from university facilities;
    2. Dissemination of information and initiatives useful for promoting social inclusion;
    3. Provision of tutoring, assistance, and support services during the course of study to provide the student with the necessary help to follow their studies successfully;
    4. Provision of financial benefits (grants, scholarships, subsidies, socio-welfare benefits, etc.).
- **OPTIONAL OR MANDATORY NATURE OF DATA PROVISION:** The provision of personal data is **optional but necessary** for the use of the services by the data subject. If the data subject refuses to provide their personal data, the Administration will be unable to provide the requested services or grant the aforementioned benefits.
- **RECIPIENTS AND DATA TRANSFER:** Data will be accessible to professors of the chosen course of study and to employees and collaborators assigned to the competent offices of the University of Sannio, duly authorized and instructed. The University may communicate data to:
  - Other public administrations for institutional proceedings;
  - Public entities where communication is mandatory by EU law or national regulations;
  - Insurance companies for accident-related procedures;

- **Public or private entities** (transport companies, helping services, meeting services, tutors, associations, or organizations) collaborating with the University to achieve the stated purposes.
- Technical service providers (appointed as **Data Processors** under Art. 28 GDPR).
- Data will **not** be transferred to non-EU countries.
- **DATA RETENTION PERIOD:** Data collected for the provision of the requested services will be stored for the time established by current legislation or University Regulations.
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15-21 of the GDPR, you have the right to request:
  - Access to your personal data and information;
  - Rectification of inaccurate data or integration of incomplete data;
  - Erasure of data, except for documents the University is legally required to keep;
  - Restriction of processing under Art. 18 GDPR.
  - **Right to Object:** To object to processing (without prejudice to mandatory processing required for the service);
  - **Withdrawal of Consent:** To withdraw consent for non-mandatory processing at any time.
- **EXERCISE OF RIGHTS:** You may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
- **COMPLAINT:** You have the right to lodge a complaint with the Italian Data Protection Authority (*Garante*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### For the processing of personal data acquired during the notification of an accident occurred to students, employees, and collaborators of the University of Sannio.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Students, employees, and collaborators of the University of Sannio who have submitted an accident report.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** Data collection is performed in compliance with the principles of lawfulness, fairness, relevance, completeness, and non-excess. The University processes the data provided following an accident report exclusively for institutional and legal activities, specifically to fulfill all requirements for the implementation of the insurance relationship.
  - **Data subject to processing include:**
    - Personal and contact details (name, surname, date and place of birth, tax code, residence, citizenship, matriculation number), identity document, contact info, degree course (for students), bank details, vehicle license plate;
    - **Special categories of data** (Art. 9 GDPR) regarding the health status or medical conditions of the data subject;
    - Specific data related to the accident (e.g., medical reports, certificates).
  - **Legal Basis:** Data are processed based on the **public interest** for the correct provision of services within the legal health insurance regime, as well as for the performance of the **contractual relationship**, specifically regarding claim management (from notification to settlement).
- **MANDATORY NATURE OF DATA PROVISION:** The provision of personal data for the aforementioned purposes is **necessary**.
- **RECIPIENTS AND DATA TRANSFER:** Data will be accessible to authorized University staff. Furthermore, data will be communicated to:
  - Insurers, insurance brokers, co-insurers, re-insurers, agents, lawyers, loss adjusters, repair shops, and service companies entrusted with the management and settlement of claims (acting as independent controllers or processors);
  - **INAIL** (National Institute for Insurance against Accidents at Work);

- Technical-administrative service providers appointed as **Data Processors** (Art. 28 GDPR).
- Data will **not** be disseminated and no transfers abroad are envisaged.
- **DATA RETENTION PERIOD:** Data are stored for the time necessary to achieve the purposes related to the insurance relationship and to comply with civil, accounting, tax, and regulatory storage obligations. Subsequently, data will be deleted or anonymized.
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15-21 of the GDPR, the data subject has the right to request:
  1. Access to their personal data.
  2. Rectification of inaccurate data or integration of incomplete data.
  3. Erasure of personal data (under Art. 17 GDPR) or restriction of processing (under Art. 18 GDPR).
  4. Withdrawal of consent at any time (where applicable).
  5. The right to lodge a complaint with the Supervisory Authority (Garante Privacy).
- **EXERCISE OF RIGHTS:** The data subject may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
- **COMPLAINT:** The data subject has the right to lodge a complaint with the Italian Data Protection Authority (*Garante*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### For the processing of personal data related to disciplinary proceedings against students.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
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- **CATEGORIES OF DATA SUBJECTS:** Students who, during their career, are subject to disciplinary proceedings.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity (Art. 5, para. 1 GDPR), the University of Sannio, as Data Controller, processes the personal data provided for the purpose of carrying out disciplinary proceedings against students.
- **CATEGORIES OF PERSONAL DATA:** The data processed are as follows:
  1. Personal details, career data, and data relating to the specific proceeding;
  2. Special categories of personal data and personal data relating to criminal convictions and offenses.
- **RECIPIENTS AND DATA TRANSFER:** Personal data are processed by University structures and employees exclusively for institutional purposes and in line with legislative and regulatory provisions. For these purposes only, data may be communicated to:
  1. Students, specialists, PhD students, and any other parties involved in the proceeding;
  2. Competent University structures;
  3. Judicial Authorities;
  4. Professors;
  5. For international students, the home University.
- **DATA RETENTION PERIOD:** The retention period for documents related to this activity is:
  1. **Unlimited** for the final provision;
  2. **5 years** for provisions that are revoked or annulled.
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15, 16, 17, 18, 19, and 21 of the GDPR, the data subject has the right to:
  1. Request access to their personal data.
  2. Request the rectification of inaccurate data or the integration of incomplete data.

3. Request the erasure of personal data concerning them (upon the occurrence of the conditions in Art. 17, para. 1 GDPR and subject to the exceptions in para. 3) and the restriction of processing (under Art. 18, para. 1 GDPR).
  4. Withdraw consent at any time, where processing is based on consent for specific purposes.
  5. Lodge a complaint with the Supervisory Authority (Garante Privacy).
- **EXERCISE OF RIGHTS:** The data subject may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
  - **COMPLAINT:** The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (*Garante*) pursuant to Art. 77 of the GDPR (<https://www.garanteprivacy.it>).

## Information Notice

### For the provision of services and activities regarding the Right to Study.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
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- **CATEGORIES OF DATA SUBJECTS:** Students benefiting from services and activities related to the Right to Study (*Diritto allo Studio*) activated and promoted by the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity (Art. 5, para. 1 GDPR), the University of Sannio, as Data Controller, shall process provided personal data aimed at guaranteeing the Right to Study. This allows the student to benefit from exemptions, subsidies, scholarships, and services for:
  - The improvement of study and living conditions;
  - The implementation of cultural, sporting, and recreational activities.
- **CATEGORIES OF PERSONAL DATA:** The data processed by the system include:
  1. **Personal and special categories of personal data:** Disability, SLD (DSA) or, in the case of student organizations with a political or religious connotation, data capable of revealing political, religious, or philosophical beliefs, etc.;
  2. **Administrative and financial data:** Personal details, academic career data, sensitive data, and economic information for tuition waiver or refund procedures and scholarships.
- **RECIPIENTS AND DATA TRANSFER:** In relation to the data necessary for the aforementioned purposes, processing by University structures and employees (e.g., student secretariats) occurs exclusively for institutional purposes in line with legislative and regulatory provisions. For these purposes only, data may also be communicated to:
  1. External entities to implement integrated services for university students and those responsible for promoting the exercise of the Right to Study.
- **DATA RETENTION PERIOD:** Data will be stored by the University of Sannio for a period of time not exceeding the achievement of the purposes, specifically regarding the principle of storage limitation (Art. 5, letter e, GDPR).
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15, 16, 17, 18, 19, and 21 of the GDPR, the data subject has the right to:
  1. Request access to their personal data.
  2. Request the rectification of inaccurate data or the integration of incomplete data.

3. Request the erasure of personal data concerning them (upon the occurrence of the conditions in Art. 17 GDPR) and the restriction of processing (under Art. 18 GDPR).
  4. Withdraw consent at any time, where processing is based on consent for specific purposes.
  5. Lodge a complaint with the Supervisory Authority (Garante Privacy).
- **EXERCISE OF RIGHTS:** The data subject may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
  - **COMPLAINT:** The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (*Garante*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### For the processing of personal data of students during lectures at the University of Sannio.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Furthermore, on January 21, 2022, a Memorandum of Understanding was signed between the Minister for Public Administration and the University of Sannio as part of the "**PA 110 e lode**" initiative. This agreement aims to define a training plan to strengthen the knowledge and skills of personnel serving in public administrations. In this context, the University of Sannio has committed to meeting the specific training needs of public administration staff by allowing attendance in person, simultaneously via synchronous distance learning (video conferencing platforms), and via asynchronous distance learning (recorded lectures).

Following the start of these training activities, the main information regarding the processing of personal data is provided below.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Students and professors of the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, and transparency (Art. 5 GDPR), the University will process personal data provided at enrollment (such as contact information and any images/audio present in video lectures, exams, or other online activities).
  - **Specific Purposes:**
    - Management of teaching activities and learning assessments;
    - Maintenance and monitoring of the video recording system (technical and hardware management);
    - Recording of lectures with the necessary sharing of contributions with all students who are public administration employees under the "PA 110 e lode" initiative and, at the professor's discretion, with the entire class group;
    - Dissemination of mandatory personal data (first name, last name, e-mail address) to students.
  - **Legal Basis:** The processing falls under the conditions of **Art. 6, para. 1, letter e)** of the GDPR (performance of a task carried out in the public interest).
- **MANDATORY NATURE OF DATA PROVISION:** The provision of personal data is **mandatory**. Refusal to provide data makes it impossible for the University to provide distance learning activities and for students to utilize them.

- **RECIPIENTS AND DATA TRANSFER:** Data will be accessible to involved professors and University staff responsible for technical support and platform management. Access may also be granted to external subjects for hardware/software maintenance, who will be appointed as **Data Processors** (Art. 28 GDPR).
- **METHODS AND DATA RETENTION PERIOD:** Data are processed using tools designed to record and store information and are kept on the **Cisco Webex Cloud** according to the "Privacy Data Sheet Cisco Webex Meetings."
  - Lectures will be stored until the **last exam session of the Academic Year** in which they were held. At the end of the Academic Year, they will be removed by the course professor.
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15-21 of the GDPR, the data subject has the right to request access, rectification, erasure (except for documents required by law), and restriction of processing. The data subject also has the right to object to processing or withdraw consent for non-mandatory activities.
- **EXERCISE OF RIGHTS:** You may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
- **COMPLAINT:** The data subject has the right to lodge a complaint with the Italian Data Protection Authority (*Garante*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### For the processing of personal data of users utilizing orientation, internship, and job placement services.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Users (e.g., students) utilizing the orientation, internship, and job placement services activated at the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** Data collection and processing are carried out in compliance with the principles of lawfulness, fairness, relevance, completeness, and non-excess. The University processes the following data:
  - **Personal and contact details:** Name, surname, date and place of birth, tax code (CF), residence, citizenship, contact info;
  - **Educational career data:** School attended / reference institution;
  - **Special categories of data (Art. 9 GDPR):** Health status (for students with disabilities and/or specific learning disabilities - SLD/DSA) to access specific support tools.

### Processing Activities:

- Registration for orientation events, mock tests, or individual counseling;
- Notifications regarding orientation initiatives or new courses;
- Improvement of orientation activities and dropout reduction via personalized paths (**Legal basis: Public Interest, Art. 6.1.e GDPR**);
- Activation of curricular, training, and orientation internships;
- In-itinere orientation and career guidance activities;
- Placement activities (**Legal basis: Consent**);
- Consultation with social partners regarding the University's educational offerings;
- Stipulation of contracts and agreements.

For promotional communications via email, mobile, or mail, the legal basis is **consent**. Providing data for legal obligations or general interest is **mandatory** to use the services; refusal results in the inability to provide the requested services. Statistical processing uses anonymous or aggregated data and falls outside the GDPR.

- **RECIPIENTS AND DATA TRANSFER:** Data will be accessible to University staff or authorized third parties (tutors, orientation offices, disability services, psychological counseling, private companies, public entities, *AlmaLaurea* database, etc.). These entities may act as **Data Processors** (Art. 28 GDPR) or as independent Data Controllers. Data may be communicated to public authorities when required by law.
- **DATA RETENTION PERIOD:** Data will be archived and stored for a **maximum of 10 years**. This period is determined by the maximum duration of a university career for an individual data subject.
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15-21 of the GDPR, you have the right to request:
  - **Access** to your personal data and information;
  - **Rectification** of inaccurate data or integration of incomplete data;
  - **Erasure** of your data (Right to be forgotten), except for documents the University is legally required to keep;
  - **Restriction** of processing under the conditions of Art. 18 GDPR;
  - **Objection** to processing (without prejudice to mandatory processing required for the relationship);
  - **Data Portability**, in a structured and machine-readable format;
  - **Withdrawal of consent** at any time for non-mandatory activities.
- **EXERCISE OF RIGHTS:** You may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
- **COMPLAINT:** You have the right to lodge a complaint with the Italian Data Protection Authority (*Garante per la protezione dei dati personali*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## COOKIE POLICY

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Users and visitors of the institutional website of the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity (Art. 5, para. 1 GDPR), the University of Sannio processes personal data managed by its web portal through the use of **cookies**.

Cookies help the University understand which parts of the site are most popular, the visitors' path, and their dwell time. They are used to study traffic patterns to improve site performance and better meet visitors' interests. Registration and path management are performed in a way that renders the data **unidentifiable**. Web beacons may also be used to track clicks on key elements (links or graphics) in emails or web pages.

**The University website uses exclusively two categories of cookies:**

1. **Essential Technical Cookies (Session Cookies):** Necessary for the site to function correctly. Without these, the services users access the site for cannot be provided.
2. **Technical Cookies for Statistics and Performance Analysis (Analytical Cookies):** These allow the University to know how visitors use the site to improve its functioning and prioritize content that meets user needs. They track the number of visitors, average time spent, and arrival methods. **All information collected is anonymous** and not linked to the user's personal data. The University uses **Google Analytics**, configured to collect data exclusively in an anonymized and/or aggregated format.

**The University of Sannio does not use profiling cookies.**

- **DATA RETENTION PERIOD:** Cookies managed by the University have a maximum duration of **365 days**, unless voluntarily renewed by the user. They are used only for the time strictly necessary for the University's institutional purposes.
- **RIGHTS OF THE DATA SUBJECT (ACCEPTANCE OR REFUSAL):** By continuing to browse, closing the information banner, or clicking any part of the page, you provide explicit acceptance of this Cookie Policy.
  - **To oppose the use of cookies:** You may leave the site.
  - **To block Google Analytics:** You can install the browser plug-in available at: <https://tools.google.com/dlpage/gaoptout>.

- **To disable Cookies/Web Beacons:** You can follow your specific browser manufacturer's instructions.

The data subject also has the right to request from the University:

- **Access** to personal data (Art. 15 GDPR);
- **Rectification** or integration of data;
- **Erasure** of data (except where retention is mandatory by law);
- **Restriction** of processing (Art. 18 GDPR);
- **Objection** to processing and **Withdrawal of consent**.
- **EXERCISE OF RIGHTS:** You may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
- **COMPLAINT:** You have the right to lodge a complaint with the Italian Data Protection Authority (*Garante*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### On the processing of personal data within the university portal system websites.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Users and visitors of the University of Sannio portal.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity (Art. 5 GDPR), the University of Sannio, as Data Controller, shall process personal data collected following navigation on the University portal.
  - **Data categories:** This includes IP addresses or domain names of computers used by users, URI (Uniform Resource Identifier) addresses of requested resources, time of request, method used to submit the request to the server, size of the file received in response, numerical status code of the server response (successful, error, etc.), and other parameters related to the user's operating system and IT environment.
  - **Data collection:** Data may also be collected through online forms required for user identification.
  - **Legal Basis:** For navigation data, the legal basis is **mutual legitimate interest**. Consent is optional and expressed upon accessing the portal.
  - **Purposes:** Enabling navigation; providing requested information and services; obtaining anonymous statistical information on service use; monitoring security and proper functioning; fulfilling legal obligations or orders from public authorities; ascertaining responsibility in case of hypothetical cybercrimes.
- **RECIPIENTS AND DATA TRANSFER:** Without express consent, the Controller may communicate data to supervisory bodies and judicial authorities where mandatory by law. Data may also be shared with:
  - Internal staff authorized to perform their duties;
  - Employees, interns, or professional consultants of the **CINECA Consortium**, in its capacity as **Data Processor** (Art. 28 GDPR).
- **DATA RETENTION PERIOD:** Data will be stored for the time strictly necessary for the purposes for which they were collected:
  1. **Telemetric services and statistical analysis:** Maximum **12 months**;

2. **Statistical analysis and service improvement:** Maximum **26 months**;
  3. **User service provision:** For the entire duration of the data subject's **contractual relationship** with the University.
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15-21 of the GDPR, the data subject has the right to request access, rectification, erasure (except where mandatory retention applies), and restriction of processing. The data subject also has the right to object to processing or withdraw consent for non-mandatory activities.
  - **EXERCISE OF RIGHTS:** You may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
  - **COMPLAINT:** The data subject has the right to lodge a complaint with the Italian Data Protection Authority (*Garante*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### **For the processing of personal data related to the purchase of goods and services and the execution of contracts.**

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Individuals involved in the purchase of goods and services and in the execution of contracts.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity (Art. 5 GDPR), the University of Sannio, as Data Controller, shall process personal data provided for the verification of the judicial, fiscal, and conduct status of suppliers and economic operators in a relationship with the University, in order to:
  - Perform preliminary activities related to the procedures for the acquisition of goods and services;
  - Coordinate and analyze the drafting of technical, administrative, and contractual documentation;
  - Manage the proceedings and related activities (execution of the contract, monitoring of procurement timelines).
- **CATEGORIES OF PERSONAL DATA:** The data processed are as follows:
  - **Personal data:** Name, contact info, identification document details (for external users), and special categories of personal data;
  - **Criminal data:** Personal data relating to criminal convictions and offenses.

It may be necessary to record personal data contained in the following documentation:

- **DURC** (Single Insurance Contribution Document - data acquired from INPS and INAIL);
- **Chamber of Commerce records** (acquired from Infocamere);
- **Criminal Record Certificate** (from the Court);
- **Checks on corporate and personal status** of counterparts (via ANAC);
- **Tax regularity checks** (via Revenue Agency and Equitalia for past records).

For purchases above the legal threshold, it is also necessary to acquire:

- **Economic offers** during the opening of the tender file;
  - **Anti-mafia certifications** (acquired from the Prefecture/Police Headquarters).
  - These checks may also be carried out in cases of *avvalimento* (reliance on the resources of other entities).
- **RECIPIENTS AND DATA TRANSFER:** Data processing by University structures, employees, and the accounting system manager (**CINECA**) occurs exclusively for institutional purposes. Recipients include structures responsible for purchasing, liquidation, litigation management, and transparency/anti-corruption compliance.
  - **DATA RETENTION PERIOD:** Retention periods vary depending on the type of contract and the subject of the supply.
    - Data is kept for as long as strictly necessary for the purposes for which it was collected.
    - For example, for goods with a lifetime warranty or software with an unlimited license, data may be kept indefinitely until the item or software is decommissioned.
    - Generally, data will be kept in line with the provisions of **Art. 2220 of the Italian Civil Code** (10 years for accounting records).
  - **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15-21 of the GDPR, you have the right to request:
    1. Access to your personal data;
    2. Rectification of inaccurate data or integration of incomplete data;
    3. Erasure of your data or restriction of processing (subject to legal exceptions);
    4. Withdrawal of consent at any time (where processing is based on consent).
  - **EXERCISE OF RIGHTS:** You may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
  - **COMPLAINT:** You have the right to lodge a complaint with the Italian Data Protection Authority (*Garante*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### **For the processing of personal data of economic operators interested in participating in contractor selection procedures, suppliers of goods and services, works contracts, and concessions.**

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

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- **CATEGORY OF DATA SUBJECTS:** Economic operators interested in participating in contractor selection procedures, suppliers of goods and services, works contracts, and concessions issued by the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** Data collection is carried out in compliance with the principles of lawfulness, fairness, transparency, relevance, completeness, and non-excess (Art. 5 GDPR). Processing is intended for:
  1. Verifying the existence of requirements for participation in contractor selection procedures;
  2. Verifying requirements mandated by law, regulations, or tender notices to contract with the public administration (e.g., judicial checks, conflict of interest, tax regularity, anti-mafia certifications, etc.);
  3. The execution of contracts and agreements;
  4. Payment of fees for services rendered to the University for any reason.

Data are processed manually, in hard copy, or electronically. Data may be processed anonymously for statistical purposes to improve services.

- **RECIPIENTS AND DATA TRANSFER:** Data will be accessible to authorized University employees and collaborators. The University may communicate data to:
  1. Other public administrations for institutional proceedings;
  2. Public entities where communication is mandatory under EU or national law;
  3. Third-party technical-administrative service providers appointed as **Data Processors** (Art. 28 GDPR).
  4. The University may independently acquire information to verify declarations made by data subjects.
- **DATA RETENTION PERIOD:** Personal data will be stored by the University of Sannio in accordance with current legislation and University regulations.

- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15-21 of the GDPR, the data subject has the right to request:
  1. **Access** to their personal data and information;
  2. **Rectification** of inaccurate data or integration of incomplete data;
  3. **Erasure** of data, except for documents the University must legally maintain or where a prevailing legitimate reason exists;
  4. **Restriction** of processing under Art. 18 GDPR;
  5. **Objection** to processing (subject to the necessity of processing for the service);
  6. **Withdrawal of consent** for non-mandatory processing.
- **EXERCISE OF RIGHTS:** You may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
- **COMPLAINT:** You have the right to lodge a complaint with the Italian Data Protection Authority (*Garante*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### On the processing of personal data for suppliers.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Suppliers of goods and services to the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, relevance, completeness, and non-excess (Art. 5 GDPR), personal data are processed through IT, electronic, and (subsidiarily) manual tools.
  - **Data categories:** Personal details (name, surname, date/place of birth, tax code, residence), contact info, bank details, and any criminal record information (final convictions, criminal decrees, or judgments) communicated during the application for the University's list of economic operators.
  - **Specific Purposes:** Verification of professional suitability, technical capacity, and professional requirements declared during registration.
- **MANDATORY NATURE OF DATA PROVISION:** The provision and processing of data are **mandatory**. Refusal to provide data will result in the failure to complete the procedure.
- **RECIPIENTS AND DATA TRANSFER:** Data will be accessible to authorized University employees and collaborators. The University may communicate data to:
  - Other public administrations for institutional proceedings;
  - Public entities where communication is mandatory (e.g., Public Prosecutor's Office for criminal records, National Anti-Mafia Database, ANAC, Revenue Agency, Chambers of Commerce, Bankruptcy Section, Provincial Labor Directorate, etc.);
  - Technical-administrative service providers appointed as **Data Processors** (Art. 28 GDPR).
- **DATA RETENTION PERIOD:** Data will be stored for a period of time not exceeding the achievement of the purposes, in accordance with the principle of storage limitation (Art. 5, letter e, GDPR).
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15-21 of the GDPR, you have the right to request:
  - **Access** to your personal data and related information;
  - **Rectification** of inaccurate data or integration of incomplete data;
  - **Erasure** of your data (except where mandatory retention applies);
  - **Restriction** of processing under the conditions of Art. 18 GDPR;

- **Objection** to processing (without prejudice to mandatory requirements for the relationship);
  - **Data Portability**, in a structured and machine-readable format;
  - **Withdrawal of consent** at any time for non-mandatory activities.
- **EXERCISE OF RIGHTS:** You may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
  - **COMPLAINT:** You have the right to lodge a complaint with the Italian Data Protection Authority (*Garante*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### Regarding the processing of personal data for the registration procedure in the List of Economic Operators.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Individuals involved in the registration procedure for the List of Economic Operators.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** Data collection and processing are carried out in compliance with the principles of lawfulness, fairness, transparency, relevance, completeness, and non-excess (Art. 5 GDPR). Processing is performed via IT, electronic, and (subsidiarily) manual tools.
  - **Processed Data:** Personal details (name, surname, date/place of birth, tax code, residence), contact info, bank details, and any information regarding criminal convictions, irrevocable criminal decrees, or plea bargains (under Art. 444 of the Italian Code of Criminal Procedure) declared during the application.
  - **Legal Bases:**
    1. **Legal Obligation (Art. 6.1.c GDPR):** To verify the absence of grounds for exclusion under Art. 80 of Legislative Decree 50/2016 and to check professional suitability and technical/professional capacity (Art. 83, Legislative Decree 50/2016).
    2. **Public Interest (Art. 6.1.e GDPR):** Processing is necessary for the performance of a task carried out in the public interest.
- **MANDATORY NATURE OF DATA PROVISION:** The provision of data is **mandatory**. Refusal to provide such data will make it impossible to complete the registration in the List of Economic Operators.
- **RECIPIENTS AND DATA TRANSFER:** Data will be accessible to authorized University employees and collaborators. The University may communicate data to:
  - Other public administrations for institutional proceedings;
  - Public entities where communication is mandatory (e.g., Public Prosecutor's Office for criminal records, National Anti-Mafia Database, ANAC, Revenue Agency, Chambers of Commerce, Bankruptcy Section, Provincial Labor Directorate, etc.);
  - Technical-administrative service providers appointed as **Data Processors** (Art. 28 GDPR).

- **DATA RETENTION PERIOD:** Data will be stored until potential cancellation by the administration or upon request by the data subject.
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15–21 of the GDPR, you have the right to request:
  - **Access** to your personal data and related information;
  - **Rectification** of inaccurate data or integration of incomplete data;
  - **Erasure** of your data (except where retention is mandatory by law);
  - **Restriction** of processing under Art. 18 GDPR;
  - **Objection** to processing;
  - **Data Portability**, in a structured and machine-readable format;
  - **Withdrawal of consent** for non-mandatory activities.
- **EXERCISE OF RIGHTS:** You may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
- **COMPLAINT:** You have the right to lodge a complaint with the Italian Data Protection Authority (*Garante*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### For the processing of personal data within the scope of e-mail services and collaboration tools.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Individuals (e.g., students and technical-administrative staff) who use the e-mail services and collaboration tools provided by the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity (Art. 5 GDPR), the University of Sannio processes personal data for the following purposes:
  - **Collaboration:** Providing IT tools (e.g., web conferencing, virtual collaboration spaces, etc.) for service delivery, troubleshooting, performance/quality evaluation (via statistics), and ensuring information security.
  - **Institutional Communication:** Managing e-mail services for service delivery, troubleshooting, usage evaluation, and ensuring information security (e.g., managing security incidents and preventing malware).
- **CATEGORIES OF PERSONAL DATA:** The data processed by the system include:
  1. **Activity/Tool-specific data:** E-mail address, IP address of the system used, career data, personal details, etc.
  2. **Account data:** E-mail addresses and, upon account creation or status change (based on role), personal details such as tax code (*codice fiscale*), ID/matriculation number, and role held.
- **RECIPIENTS AND DATA TRANSFER:** Data processing is carried out by authorized University structures (IT area and departments managing collaboration tools) and supplier companies. Data may be transferred abroad only if e-mail services are outsourced to an international provider.
- **DATA RETENTION PERIOD:** Retention periods vary based on the tool and purpose.
  1. **General Principle:** Data is kept as long as there is a justifiable interest and for the time strictly necessary for the purposes of collection. Usually, this does not exceed **6 months**.
  2. **E-mail services:** Retention depends on internal regulations, which often specify different periods (e.g., account deletion timelines) based on the user's role.
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15, 16, 17, 18, 19, and 21 of the GDPR, the data subject has the right to:

1. Request access to their personal data.
  2. Request the rectification of inaccurate data or the integration of incomplete data.
  3. Request the erasure of their personal data or the restriction of processing (subject to the conditions of Arts. 17 and 18 GDPR).
  4. Withdraw consent at any time, where processing is based on consent.
  5. Lodge a complaint with the Supervisory Authority (Garante Privacy).
- **EXERCISE OF RIGHTS:** The data subject may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
  - **COMPLAINT:** The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (*Garante per la protezione dei dati personali*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### For the processing of data within library services.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Individuals utilizing the library services offered at the facilities of the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity (Art. 5 GDPR), the University of Sannio, as Data Controller, shall process provided personal data to allow faculty, technical-administrative staff, the student population, and citizens to access:
  - Centralized services of the library system and individual University libraries (consultation and loan of bibliographic and documentary heritage in paper and electronic format);
  - Interlibrary loans and document delivery;
  - Reference services and information on activities/services offered.
  - *Note:* Data may be processed anonymously for statistical purposes and satisfaction surveys to improve services. Specific health-related data may be processed if the library provides services specifically for users with disabilities (e.g., assistive technology workstations).
- **CATEGORIES OF PERSONAL DATA:** The data processed by the system include:
  - **Personal data:** Identification details, contact information, and ID document details (for external users);
  - **Special categories of data:** For example, in the case of users in a state of gender transition, or health-related data for the provision of assistive technologies and disability services.
- **RECIPIENTS AND DATA TRANSFER:** Data processing is carried out by University structures and employees exclusively for institutional purposes. Recipients include:
  - University Library structures and other University offices (e.g., Student Secretariats for degree completion clearances);
  - External companies/cooperatives providing services to the libraries;
  - Partner entities under specific agreements;
  - Libraries of other institutions/universities (for interlibrary loans);

- Cloud providers of Integrated Library Systems (ILS), Discovery tools, link resolvers, "Ask a librarian" services, etc.
- **DATA RETENTION PERIOD:** Data will be stored by the University of Sannio for a period of time not exceeding the achievement of the purposes, in accordance with the principle of storage limitation (Art. 5, letter e, GDPR).
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15, 16, 17, 18, 19, and 21 of the GDPR, the data subject has the right to:
  1. Request access to their personal data.
  2. Request the rectification of inaccurate data or the integration of incomplete data.
  3. Request the erasure of their personal data or the restriction of processing (subject to legal conditions and exceptions).
  4. Withdraw consent at any time, where processing is based on consent.
  5. Lodge a complaint with the Supervisory Authority (Garante Privacy).
- **EXERCISE OF RIGHTS:** The data subject may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
- **COMPLAINT:** The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (*Garante per la protezione dei dati personali*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### **For the processing of personal data aimed at fundraising, institutional communication and information, and community development.**

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Individuals involved in fundraising, institutional communication and information activities, and community development promoted by the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity (Art. 5 GDPR), the University of Sannio, as Data Controller, shall process personal data for:
  - Fundraising purposes and community development (including data related to former students or former employees of the University);
  - Promotion of the University's image and its activities, providing awareness and visibility to events organized by or involving the University.
- **CATEGORIES OF PERSONAL DATA:** The data processed are primarily identification details, contact information, and potentially videos and images of students, employees, and third parties (alumni, supporters, etc.).
- **RECIPIENTS AND DATA TRANSFER:** In relation to the purposes above, personal data may be processed by:
  - University structures in charge of the service;
  - External community management and/or fundraising services;
  - Shipping companies and event organization companies.
  - **International Transfer:** Data may be transferred outside the EU only if the recipients mentioned above (e.g., a non-EU company organizing a research event at the University) operate or process data in non-EU areas.
- **DATA RETENTION PERIOD:** Data will be stored by the University of Sannio for a period of time not exceeding the achievement of the purposes, in accordance with Art. 5 of the GDPR. Specifically, retention times are strictly dependent on the specific management areas (e.g., academic career, financial reporting, etc.) and the laws applicable to those areas.
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15, 16, 17, 18, 19, and 21 of the GDPR, the data subject has the right to:

1. Request access to their personal data.
  2. Request the rectification of inaccurate data or the integration of incomplete data.
  3. Request the erasure of their personal data or the restriction of processing (subject to the conditions and exceptions provided by the GDPR).
  4. Withdraw consent at any time, where processing is based on consent for specific purposes.
  5. Lodge a complaint with the Supervisory Authority (Garante Privacy).
- **EXERCISE OF RIGHTS:** The data subject may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
  - **COMPLAINT:** The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (*Garante per la protezione dei dati personali*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### For the processing of personal data related to Welfare policies and the use of benefits.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Individuals involved in Welfare policies and the use of benefits promoted by the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** Data collection is carried out in compliance with the principles of lawfulness, fairness, relevance, completeness, and non-excess (Art. 5 GDPR). The University of Sannio processes personal data to promote policies allowing University personnel to access benefits, services, and/or subsidies. The processing includes:
  - **Identification and contact data:** Name, surname, date and place of birth, tax code, residence, citizenship, ID number (for students and staff), identity document, contact info, degree course (for students), bank account details (IBAN), and vehicle license plate;
  - **Special categories of personal data:** Data relating to disabilities or Specific Learning Disorders (SLD/DSA).
- **MANDATORY NATURE OF DATA PROVISION:** The provision of personal data for the aforementioned purposes is **mandatory**.
- **RECIPIENTS AND DATA TRANSFER:** Data will be accessible to authorized University employees and collaborators. Management and storage occur at:
  - Relevant University structures;
  - Suppliers/Entities/Cooperatives (e.g., for after-work/recreational activities);
  - Companies providing insurance policies for personnel;
  - External entities implementing integrated services for employees and/or Welfare policies.
- **DATA RETENTION PERIOD:** Data are kept for the time strictly necessary to fulfill the socio-assistance relationship and to comply with legal, accounting, tax, and regulatory retention obligations. After this period, data will be deleted or anonymized.
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15, 16, 17, 18, 19, and 21 of the GDPR, the data subject has the right to:
  1. Request access to their personal data.
  2. Request the rectification of inaccurate data or the integration of incomplete data.

3. Request the erasure of their personal data or the restriction of processing (subject to the conditions and exceptions provided by the GDPR).
  4. Withdraw consent at any time, where processing is based on consent for specific purposes.
  5. Lodge a complaint with the Supervisory Authority (Garante Privacy).
- **EXERCISE OF RIGHTS:** The data subject may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
  - **COMPLAINT:** The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (*Garante per la protezione dei dati personali*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

Here is the English translation for the privacy notice concerning **Fixed and Mobile Telephony Services**.

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## Information Notice

### For the processing of personal data within the scope of fixed and mobile telephony services.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Individuals involved in the management of fixed and/or mobile telephone lines and devices, reporting, and user assistance.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity (Art. 5 GDPR), the University of Sannio, as Data Controller, shall process personal data to manage all activities related to the management of fixed and/or mobile telephone lines and devices, related reporting, and user assistance services.
- **CATEGORIES OF PERSONAL DATA:** The data processed by the system are:
  - Personnel records, career, affiliated structure, prefixes (authorization levels for making calls), incoming/outgoing calls, expenses, dual billing authorizations, and other data traffic information, such as:
    1. The number or identification of the user and the subject to whom the call is transmitted;
    2. The total number of units or the duration of traffic to be considered for the reporting period;
    3. The type, start time, and duration of calls made, and the volume of data transmitted;
    4. The date of the call or use of the service;
    5. Information concerning payments.
  - Regarding mobile telephony, additional personal data will be processed for reporting and billing purposes.
- **RECIPIENTS AND DATA TRANSFER:** Recipients are identified as all holders of a fixed and/or mobile account, as well as individuals who receive or make calls on University lines.
- **DATA RETENTION PERIOD:** \* Telephone traffic data not tracked by the telephone operator: **Six months**.

- Telephone traffic data tracked by the operator: Retention times are those established by current legislation.
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15, 16, 17, 18, 19, and 21 of the GDPR, the data subject has the right to:
  1. Request access to their personal data.
  2. Request the rectification of inaccurate data or the integration of incomplete data.
  3. Request the erasure of their personal data or the restriction of processing (subject to the conditions and exceptions provided by the GDPR).
  4. Withdraw consent at any time, where processing is based on consent for specific purposes.
  5. Lodge a complaint with the Supervisory Authority (Garante Privacy).
- **EXERCISE OF RIGHTS:** The data subject may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
- **COMPLAINT:** The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (*Garante per la protezione dei dati personali*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### Regarding the processing of personal data related to the service for converting digital documents into accessible formats.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Individuals whose personal data are contained within documents undergoing the digital document conversion service into accessible formats.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity (Art. 5 GDPR), the University of Sannio processes data necessary to provide the conversion service.
  - **Access and Navigation Data:** To use the service, an institutional e-mail address is required. Additionally, computer systems and software procedures acquire data whose transmission is implicit in the use of Internet communication protocols (e.g., IP addresses, domain names, URI addresses, request timestamps, server response status codes, operating system parameters).
  - **Security and Principles:** Processing is carried out through manual, IT, and electronic tools ensuring security and confidentiality. The University adheres to the principles of lawfulness, data minimization, limitation, security (standard industry best practices), accuracy, and integrity.
  - **Specific Purposes:**
    1. **Service Access:** Legal basis is the performance of a request by the data subject (**Art. 6.1.b GDPR**).
    2. **Legal Obligations:** To comply with laws or orders from public authorities (**Art. 6.1.c GDPR**).
    3. **Analytics and Monitoring:** To obtain anonymous statistics, monitor security, and improve the service based on legitimate interest (**Art. 6.1.f GDPR**).
    4. **Security Investigation:** To ascertain responsibility in case of hypothetical cybercrimes against the service or its users (**Art. 6.1.f GDPR**).
- **DATA RETENTION PERIOD:** Regarding service access, data will be kept only for the time strictly necessary to provide the requested service.
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15, 16, 17, 18, 19, and 21 of the GDPR, the data subject has the right to request:

- **Access** to their personal data and information;
  - **Rectification** of inaccurate data or integration of incomplete data;
  - **Erasure** of their data (except where mandatory retention is required by the University or a prevailing legitimate reason exists);
  - **Restriction** of processing under Art. 18 GDPR;
  - **Objection** to processing (without prejudice to the necessity of processing for service delivery);
  - **Withdrawal of consent** for non-mandatory processing.
- **EXERCISE OF RIGHTS:** The data subject may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
  - **COMPLAINT:** The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (*Garante per la protezione dei dati personali*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### For the processing of personal data within the scope of space management.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Individuals involved in the activities and procedures for the management of spaces provided by the University of Sannio. Specifically, this includes the applicant requesting the use of the space, disabled individuals requesting access to the spaces, any third parties requesting the use of the spaces, and individuals who physically utilize the spaces.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity (Art. 5 GDPR), the University of Sannio, as Data Controller, shall process provided personal data to enable the use of University spaces for activities such as:
  - Assignment of spaces to University structures and allocation of individuals within those spaces;
  - Access control at gates/entrances for employees, collaborators, and students;
  - Centralized and coordinated management of classrooms and teaching spaces;
  - Management of administrative procedures for space requests regarding institutional events;
  - Management of administrative procedures for space requests from third parties.
- **CATEGORIES OF PERSONAL DATA:** Regarding the applicant, personal identification and career data will be processed. For space usage by third parties, additional personal data related to administrative requirements (e.g., to verify the validity of access authorizations) will also be processed.
  - For space access by disabled individuals, data concerning **health status** may be processed.
  - If access control is implemented, data regarding entry/exit times and user identifiers (e.g., **badge** data) may be collected.
- **RECIPIENTS AND DATA TRANSFER:** Personal data will be processed by University structures and employees in charge of logistics management, heads of structures, and any designated logistics managers. Some information may be made available via **public access** (e.g., consulting the university directory to locate personnel within the spaces).

- **DATA RETENTION PERIOD:** Retention periods are linked to internal space management procedures. In cases where spaces are granted to external parties, data retention will be strictly connected to the retention periods established by current accounting and financial regulations.
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15, 16, 17, 18, 19, and 21 of the GDPR, the data subject has the right to:
  1. Request access to their personal data.
  2. Request the rectification of inaccurate data or the integration of incomplete data.
  3. Request the erasure of their personal data or the restriction of processing (subject to the conditions and exceptions provided by the GDPR).
  4. Withdraw consent at any time, where processing is based on consent for specific purposes.
  5. Lodge a complaint with the Supervisory Authority (Garante Privacy).
- **EXERCISE OF RIGHTS:** The data subject may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
- **COMPLAINT:** The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (*Garante per la protezione dei dati personali*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### For the processing of personal data via video surveillance systems located near the entrances of university premises and in the classrooms of the University of Sannio.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Users of the spaces and the educational and administrative premises of the University of Sannio subject to video surveillance systems.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** Data collection is carried out in compliance with the principles of necessity, proportionality, relevance, and non-excess. Processing is performed to pursue the University's **legitimate interests** in the exercise of its institutional functions. The cameras are positioned to avoid capturing neighboring public spaces, workstations, or badge readers, and do not record audio.

The images are processed exclusively for:

- **Prevention:** Ensuring the safety and security of university staff, students, and visitors;
- **Asset Protection:** Safeguarding the University's movable and immovable property;
- **Vandalism Prevention:** Assisting competent authorities in ascertaining facts related to potential acts of vandalism;
- **Public Health:** Limited to the duration of the COVID-19 epidemiological emergency.

*Note:* In accordance with Art. 4 of Law 300/1970, video surveillance is **not** used for the remote monitoring of workers.

- **RECIPIENTS AND DATA TRANSFER:** Images are processed by authorized university personnel or external "Data Processors" providing surveillance services. Data may be shared with public authorities or law enforcement upon specific request. Data will **not** be transferred outside the European Union.
- **DATA RETENTION PERIOD:**
  - **Standard:** Images are recorded 24/7 and stored for **24 hours**, after which they are automatically overwritten.
  - **Exceptions:** Longer retention applies for holidays, office closures, or specific judicial/police investigations.
  - **COVID-19 Health Protection:** Images recorded for public health purposes are stored for **7 days**.

- **Storage:** Images are stored on local NVRs (Network Video Recorders) and a centralized backup NVR. Data can only be extracted using specific passwords assigned to authorized personnel. No automated identity recognition (facial recognition) or database cross-referencing is performed.
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15–21 of the GDPR, the data subject has the right to:
  - Access their personal data;
  - Request rectification or integration of data;
  - Request erasure (except where retention is legally mandatory);
  - Request restriction of processing;
  - Object to processing;
  - Withdraw consent (for non-mandatory processing).
- **EXERCISE OF RIGHTS:** You may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
- **COMPLAINT:** You have the right to lodge a complaint with the Italian Data Protection Authority (*Garante*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### For the processing of personal data for the production of promotional and educational videos and multimedia material.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Individuals involved in the creation of promotional and educational video and multimedia material promoted by the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity (Art. 5 GDPR), the University of Sannio shall process images of students and staff involved in filming and photography. These will be recorded to prepare videos and multimedia materials to be used as promotional and educational tools for University activities.
  - **Additional Data:** Telephone numbers, e-mails, etc., used to contact subjects for planning filming or photography.
  - **Dissemination:** Materials will be published on University Portal websites and official social network accounts (Facebook, X/Twitter, Instagram).
  - **Consent:** Data provision is based on the **express consent** of the data subject. Refusal results in exclusion from filming/photography. Consent is also expressed at public events when an individual voluntarily enters spaces (e.g., conference halls, event areas) where recording services are active. These spaces will be clearly identified with specific **iconic signage/notices**.
- **PROCESSING METHODS:** Data collection follows the principles of relevance, completeness, and non-excess. Processing is carried out using tools designed to record and store data securely and confidentially, with specific security measures (Art. 32 GDPR) to prevent loss, illicit use, or unauthorized access.
- **RECIPIENTS AND DATA TRANSFER:** Data will be accessible to authorized University employees (Art. 29 GDPR) and to individuals or companies providing consultancy, recording, and editing services (Data Processors under Art. 28 GDPR). Materials may also be used in local and national dissemination events for orientation, promotion, and communication purposes.
- **DATA RETENTION PERIOD:** Personal data will be kept by the University only for the time strictly necessary for the processing, after which they will be deleted.
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15, 16, 17, 18, 19, and 21 of the GDPR, the data subject has the right to request:

1. Access to their personal data and related information;
  2. Rectification of inaccurate data or integration of incomplete data;
  3. Erasure of data (except where retention is legally mandatory);
  4. Restriction of processing under Art. 18 GDPR;
  5. Objection to processing;
  6. Withdrawal of consent at any time (without affecting the lawfulness of processing based on consent before its withdrawal).
- **EXERCISE OF RIGHTS:** The data subject may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
  - **COMPLAINT:** The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (*Garante per la protezione dei dati personali*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Release Form for the Use of Likeness and Audio-Video Recordings

**Given that** pursuant to Art. 96 of Law no. 633 of April 22, 1941, a person's portrait may not be exhibited, reproduced, or marketed without their consent, unless the conditions provided for by Art. 97 are met—which stipulates that the consent of the person portrayed is not required when the reproduction of the image is justified by fame or public office held, by justice or police requirements, by scientific, educational, or cultural purposes, or when the reproduction is linked to facts, events, or ceremonies of public interest or held in public:

The undersigned: **Name:** \_\_\_\_\_ **Surname:** \_\_\_\_\_  
\_\_\_\_\_ **E-mail:** \_\_\_\_\_ **Tel.:** \_\_\_\_\_

\_\_\_\_\_ In reference to the event:  
\_\_\_\_\_ Held on (date):  
\_\_\_\_\_

### DECLARES

- That I have read and understood the **Information Notice on the processing of personal data** provided above and consequently:

I GIVE CONSENT     I DENY CONSENT

- For the University of Sannio to process my personal data for the purposes and according to the methods described therein.

### AUTHORIZES

- The University of Sannio to use my image for the production of video and multimedia materials, created and used exclusively for promotional and educational purposes, including publication on institutional portals and official University social media channels;
- The communication to the public, pursuant to Art. 16 of Law no. 633 of April 22, 1941, of audio/video recordings via the communication channels of the University of Sannio;
- The granting of a **non-exclusive license, free of charge, without duration limits and worldwide**, transferable to third parties, for the use of the Materials, including the rights set forth in Articles 12 to 19 of Law no. 633 of April 22, 1941.

### DECLARES

- That under no circumstances may the undersigned claim compensation from the University of Sannio for any moral or material damages caused by third parties and/or by uses not provided for in this release;
- To assume full responsibility for any statements made, releasing the University of Sannio from any claims or actions, including those by third parties;
- The undersigned further **prohibits** the use of images in contexts that may prejudice their personal dignity and decorum.

Date: // \_\_\_\_\_

Signature (legible): \_\_\_\_\_

## Information Notice

### Regarding enrollment in a Master's Degree program.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Candidates who, following the submission of an application and the successful completion of the selection process, formalize their enrollment in a training course/Master's program active at the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity (Art. 5 GDPR), the University of Sannio shall process personal data collected at the time of enrollment, during the training course, or subsequently regarding the academic career, for institutional purposes and within the limits established by law and regulations (specifically D.R. 271/2009).
  - **Scope:** Activities related to teaching, research, and the right to study, including statistical and scientific purposes to improve services.
  - **Third-party Management:** The University may use third-party Management Entities for activities such as fund management and organizational collaboration. These entities may access data for:
    - Accessing the list of enrollees;
    - Conducting pre-selection tests and drafting related minutes;
    - Ranking list preparation;
    - Evaluating financial/income status;
    - Attendance management and drafting exam minutes.
  - **Sensitive Data:** Health-related data may be processed if the data subject requests specific aids or services for tests or for institutional purposes related to the training path.
- **CATEGORIES OF PERSONAL DATA:**
  1. Name, surname, qualification, and tax code (*codice fiscale*).
  2. E-mail address and contact details.
  3. Income/financial data.
- **RECIPIENTS AND DATA TRANSFER:** For operational needs, the University may communicate data to:

1. **MUR** (Ministry of University and Research) and **CUN** (National University Council);
  2. Certifying Administrations (for verification of self-declarations under DPR 445/2000);
  3. Regional Management Bodies, University and Academic Institutes (including foreign and non-EU) for international mobility and transfers;
  4. Private entities for orientation and job placement (Art. 96 D.lgs. 196/03) or to confirm qualifications;
  5. Insurance companies and **INAIL** (for accident management);
  6. Public and private entities (Foundations, Associations, Businesses) for financial benefits or institutional activities;
  7. Judicial Authorities.
- **DATA RETENTION PERIOD:** Data will be stored by the University of Sannio for a period not exceeding the achievement of the purposes, in accordance with the principle of storage limitation (Art. 5.1.e GDPR).
  - **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15–21 of the GDPR, the data subject has the right to:
    1. Request access to their personal data.
    2. Request rectification or integration of data.
    3. Request erasure or restriction of processing (subject to legal conditions).
    4. Withdraw consent at any time (where processing is based on consent).
    5. Lodge a complaint with the Supervisory Authority (Garante Privacy).
  - **EXERCISE OF RIGHTS:** The data subject may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
  - **COMPLAINT:** The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (*Garante per la protezione dei dati personali*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Informativa

### per l'iscrizione ad un Dottorato di Ricerca.

Il Regolamento Generale sulla Protezione dei dati Personali (Regolamento UE 2016/679 del Parlamento Europeo e del Consiglio del 27 aprile 2016), d'ora in avanti GDPR e il d.lgs. n. 196/2003 e s.m.i. "Codice in materia di protezione dei dati personali", a seguito della legge 10 agosto 2018, n. 101 che ha adeguato la normativa nazionale al Regolamento UE 2016/679 prevede la protezione delle persone fisiche con riguardo al trattamento dei dati di carattere personale come diritto fondamentale.

Ai sensi degli artt. 13 e 14 del GDPR, La informiamo che:

**TITOLARE DEL TRATTAMENTO:** Titolare del Trattamento è l'Università degli Studi del Sannio, nella persona del Magnifico Rettore *pro tempore*, con sede legale presso il palazzo San Domenico, 82100, Benevento, e-mail [rettore@unisannio.it](mailto:rettore@unisannio.it).

**RESPONSABILE DELLA PROTEZIONE DEI DATI:** Responsabile della protezione dei dati (RPD) è la Società PA33 Srl, e-mail [dpo@unisannio.it](mailto:dpo@unisannio.it), [P.E.C. dpo@cert.unisannio.it](mailto:P.E.C. dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).

**CATEGORIE DEGLI INTERESSATI DAL TRATTAMENTO:** candidati che dopo il superamento delle prove selettive per l'accesso ai percorsi di studio di dottorato di ricerca decidono di formalizzare l'iscrizione al dottorato di ricerca attivo presso l'Università degli Studi del Sannio.

**FINALITA' DEL TRATTAMENTO E BASE GIURIDICA:** nel rispetto dei principi di liceità, correttezza, trasparenza, adeguatezza, pertinenza e necessità di cui all'art. 5, paragrafo 1 del GDPR l'Università degli Studi del Sannio, in qualità di Titolare del trattamento, provvederà al trattamento dei dati personali, anche con l'ausilio di mezzi elettronici, per le finalità di gestione delle procedure di selezione ed immatricolazione, per la gestione della carriera universitaria del Candidato/Dottorando e, più in generale, per lo svolgimento delle pertinenti attività amministrative, didattiche, di ricerca e del diritto allo studio proprie dell'Ateneo.

**CATEGORIE DI DATI PERSONALI** I dati trattati dal sistema sono i seguenti:

1. Nome, cognome, qualifica, codice fiscale degli interessati.
2. Indirizzo di posta elettronica e recapiti.
3. dati reddituali.

**DESTINATARI DEI DATI ED EVENTUALE TRASFERIMENTO** In relazione ai dati necessari per le finalità sopra riportate l'Ateneo, per necessità operative, può comunicare i dati a:

- M.I.U.R. (Ministero dell'Università e della Ricerca) per l'espletamento delle funzioni attribuite dalla legge;
- C.U.N. (Consiglio Universitario Nazionale) per le funzioni istituzionali ad esso attribuite dalla legge;
- INPS e Agenzia delle Entrate, per l'erogazione delle borse di dottorato;
- Amministrazioni certificanti, in sede di controllo delle dichiarazioni sostitutive rese ai fini del DPR n. 445/2000;
- Enti pubblici, ai fini dell'attribuzione di eventuali, sussidi, contributi o altri benefici anche a favore di particolari categorie di dottorandi;

- Enti pubblici di Paesi terzi e soggetti privati, anche stranieri, per gli adempimenti connessi all'attribuzione di borse di dottorato;
- Avvocatura dello Stato, Ministero degli Affari esteri, Questure, Ambasciate, Procura della Repubblica relativamente a permessi di soggiorno o al riconoscimento di particolari status del dottorando;
- Regione, altri operatori pubblici e privati accreditati o autorizzati e potenziali datori di lavoro, ai fini dell'orientamento e inserimento nel mondo del lavoro (ai sensi della legge 30/2003, sulla riforma del mercato del lavoro, e successive attuazioni);
- Enti di assicurazione e Inail, per gli adempimenti relativi alle assicurazioni ed alla gestione infortuni;
- Organismi Regionali di Gestione (Enti dotati di autonomia amministrativo-gestionale istituiti ai sensi della legge n. 390/91 in materia di diritto agli studi universitari), Istituti universitari ed accademici, anche stranieri ed extracomunitari per gli adempimenti e le attività dirette a favorire la mobilità internazionale dei dottorandi e per la gestione dei trasferimenti;
- Università ed Enti Accademici stranieri, nell'ambito delle convenzioni che prevedono l'istituzione di corsi di dottorato con titoli congiunti, doppi o multipli e per i dottorati in cotutela;
- altri soggetti pubblici o privati ai quali l'Ateneo affida dei servizi di propria competenza, nei limiti previsti dalla legge, in out-sourcing o con i quali sono poste in essere delle convenzioni o degli accordi (es: per la stampa delle pergamene di laurea);
- a soggetti privati per il perseguimento di finalità di placement e terza missione;
- autorità giudiziaria;
- a personale dell'Ateneo per svolgere attività di ricerca finalizzate ad analizzare possibili miglioramenti dei servizi, in una forma che non consenta la diretta identificazione dell'interessato;
- a soggetti privati, anche stranieri, per confermare la presenza di eventuali titoli o requisiti, con lo scopo di agevolare l'orientamento, la formazione e l'inserimento professionale, nel rispetto del capo V del GDPR (Trasferimento di dati personali verso paesi terzi o organizzazioni internazionali).

**PERIODO DI CONSERVAZIONE DEI DATI** I dati saranno conservati dall'Università degli Studi del Sannio, conformemente ai principi di cui all'art. 5 Regolamento (UE) 2016/679, per un arco di tempo non superiore al conseguimento delle finalità e con specifico riguardo al principio di limitazione della conservazione di cui all'art. 5, lett. e), Regolamento (UE) 2016/679.

**DIRITTI DELL'INTERESSATO** L'interessato ha diritto di richiedere all'Università degli Studi del Sannio, quale Titolare del Trattamento, ai sensi degli artt. 15, 16, 17, 18, 19 e 21 del GDPR:

1. Richiedere l'accesso ai suoi dati personali.
2. Richiedere la rettifica dei dati inesatti o l'integrazione di quelli incompleti.
3. Richiedere la cancellazione dei dati personali che lo riguardano (al verificarsi di una delle condizioni indicate nell'art. 17, paragrafo 1 del GDPR e nel rispetto delle eccezioni previste nel paragrafo 3 dello stesso articolo) e la limitazione del trattamento dei dati personali (al ricorrere di una delle ipotesi indicate nell'art. 18, paragrafo 1 del GDPR).
4. Revocare il consenso in qualsiasi momento, limitatamente alle ipotesi in cui il trattamento sia basato sul consenso per una o più specifiche finalità.

5. Proporre reclamo all'Autorità di controllo (Garante Privacy, <http://www.garanteprivacy.it>).

**MODALITA' DI ESERCIZIO DEI DIRITTI** L'interessato potrà esercitare tutti i diritti di cui sopra (anche utilizzando l'apposito modello pubblicato alla pagina <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) inviando una richiesta al Responsabile della protezione dei dati all'indirizzo e-mail [dpo@unisannio.it](mailto:dpo@unisannio.it) o agli indirizzi P.E.C. [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).

**RECLAMO** L'interessato ha diritto anche di proporre reclamo all'Autorità Garante per la protezione dei dati personali ai sensi dell'art. 77 del GDPR (<https://www.garanteprivacy.it>).

## Information Notice

### For the processing of personal data to ensure the monitoring and evaluation of research.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Teaching staff (or individuals involved in various capacities in scientific research activities, e.g., research fellows, scholarship holders, subject experts) serving at the University of Sannio whose scientific production is subject to research monitoring and evaluation.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity (Art. 5 GDPR), the University of Sannio, as Data Controller, shall process personal data for the purpose of research monitoring and evaluation: classification and cataloging of research products (via the **IRIS** Research Data Management System) and research assessment.
- **CATEGORIES OF PERSONAL DATA:** The data processed by the system include:
  1. **Identification and career data:** Contact details and unique international identification codes (e.g., **ORCID**) referring to a specific researcher.
  2. **Project Management data:** Descriptive research data, funding and co-funding provided, research groups (internal personnel records), partner entities, and funding bodies.
  3. **Reporting and Accounting tools:** (e.g., via **UGOV TimeSheet**) Personal data, career details, and the allocation of hours to research and teaching.
- **RECIPIENTS AND DATA TRANSFER:** In relation to the purposes above, data will be processed by authorized University structures and employees (Accounting, Research Services). For these purposes only, data may also be communicated to:
  1. **ANVUR** (National Agency for the Evaluation of Universities and Research Institutes);
  2. **Funding bodies** (MUR, Regions, EU, etc.);
  3. **Foreign Entities/Companies** participating in the research or acting as funders.
- **DATA RETENTION PERIOD:** Data will be stored by the University of Sannio for a period not exceeding the achievement of the purposes, in accordance with Art. 5 of the GDPR. Retention times are strictly dependent on the specific management areas (e.g., academic career, reporting, etc.) and the regulations applicable to those areas.

- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15, 16, 17, 18, 19, and 21 of the GDPR, the data subject has the right to request:
  1. Access to their personal data.
  2. Rectification of inaccurate data or integration of incomplete data.
  3. Erasure of their personal data or restriction of processing (subject to the conditions and exceptions provided by the GDPR).
  4. Withdrawal of consent at any time, where processing is based on consent for specific purposes.
  5. Lodge a complaint with the Supervisory Authority (Garante Privacy).
- **EXERCISE OF RIGHTS:** The data subject may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
- **COMPLAINT:** The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (*Garante per la protezione dei dati personali*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### For the processing of personal data necessary for the management of research projects.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Individuals involved in various capacities (e.g., managers, coordinators, members of a research group) in research projects promoted at the University of Sannio.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity (Art. 5 GDPR), the University of Sannio, as Data Controller, shall process provided personal data specifically aimed at:
  - Managing activities related to funding for research and scientific training;
  - Ensuring the coordination of research activities, particularly at the European and international levels;
  - Promoting the development of research activities and enhancing the value of their results.
- **CATEGORIES OF PERSONAL DATA:** The data processed by the system include:
  1. **Identification and career data:** Contact details and unique international identification codes referring to a specific researcher.
  2. **Project Management data:** Descriptive research data, funding and co-funding provided, research groups (internal personnel records), partner entities, and funding bodies.
  3. **Reporting and Accounting tools:** Personal data, career details, and the allocation of hours to research and teaching.
- **RECIPIENTS AND DATA TRANSFER:** Personal data will be processed by authorized University structures and employees (Accounting, Research Services). For these purposes only, data may also be communicated to:
  1. **ANVUR** (National Agency for the Evaluation of Universities and Research Institutes);
  2. **Funding bodies** (MUR, Regions, EU, etc.);
  3. **Foreign Entities/Companies** participating in the research or acting as funders.
- **DATA RETENTION PERIOD:** Data will be stored by the University of Sannio for a period not exceeding the achievement of the purposes, in accordance with Art. 5 of the GDPR. Retention times

are strictly dependent on the specific management areas (e.g., academic career, reporting, etc.) and the regulations applicable to those areas.

- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15, 16, 17, 18, 19, and 21 of the GDPR, the data subject has the right to:
  1. Request access to their personal data.
  2. Request rectification of inaccurate data or integration of incomplete data.
  3. Request erasure of their personal data or restriction of processing (subject to the conditions and exceptions provided by the GDPR).
  4. Withdraw consent at any time, where processing is based on consent for specific purposes.
  5. Lodge a complaint with the Supervisory Authority (Garante Privacy).
- **EXERCISE OF RIGHTS:** The data subject may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
- **COMPLAINT:** The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (*Garante per la protezione dei dati personali*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

Here is the English translation for the privacy notice concerning **Statistical Surveys and Teaching Evaluation**.

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## Information Notice

### For statistical surveys and the evaluation of teaching activities.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Individuals (e.g., students) participating in statistical surveys and teaching evaluation activities.
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity (Art. 5 GDPR), the University of Sannio, as Data Controller, shall process provided personal data for statistical surveys aimed at pursuing the University's institutional goals (e.g., research activities, quality assurance, or activities intended to improve the overall image of the University).
- **RECIPIENTS AND DATA TRANSFER:** In relation to the purposes above, the processing of personal data by University structures and employees in charge of the service (e.g., student registry, Departments, Faculty Councils, Commissions, Evaluation Committee) is carried out exclusively for institutional purposes and in line with the relevant legislative and regulatory provisions. For these purposes only, data may also be communicated to:
  - **ANVUR** (National Agency for the Evaluation of Universities and Research Institutes);
  - **MUR** (Ministry of University and Research);
  - **Funding bodies** (MUR, Regions, EU, etc.);
  - **Certifying administrations**, when verifying self-declarations submitted pursuant to Presidential Decree (D.P.R.) no. 445/2000.
- **DATA RETENTION PERIOD:** Data will be stored by the University of Sannio for a period not exceeding the achievement of the purposes, in accordance with Art. 5 of the GDPR and with specific regard to the principle of storage limitation (Art. 5.1.e GDPR).
- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15, 16, 17, 18, 19, and 21 of the GDPR, the data subject has the right to:
  1. Request access to their personal data.
  2. Request the rectification of inaccurate data or the integration of incomplete data.

3. Request the erasure of their personal data or the restriction of processing (subject to the conditions and exceptions provided by the GDPR).
  4. Withdraw consent at any time, where processing is based on consent for specific purposes.
  5. Lodge a complaint with the Supervisory Authority (Garante Privacy).
- **EXERCISE OF RIGHTS:** The data subject may exercise these rights (using the form at <https://www.unisannio.it/it/ateneo/amministrazione/privacy>) by contacting the DPO at [dpo@unisannio.it](mailto:dpo@unisannio.it) or via the provided P.E.C. addresses.
  - **COMPLAINT:** The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (*Garante per la protezione dei dati personali*) at [www.garanteprivacy.it](http://www.garanteprivacy.it).

## Information Notice

### For the processing of personal data for the management of institutional bodies and offices.

The General Data Protection Regulation (EU Regulation 2016/679), hereinafter **GDPR**, and Legislative Decree no. 196/2003 as amended ("Personal Data Protection Code") — following Law no. 101 of 10 August 2018, which adapted national legislation to EU Regulation 2016/679 — provides for the protection of individuals with regard to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, we inform you that:

- **DATA CONTROLLER:** The Data Controller is the University of Sannio, represented by the *Magnifico Rettore pro tempore*, with registered office at Palazzo San Domenico, 82100, Benevento, e-mail: [rettore@unisannio.it](mailto:rettore@unisannio.it).
- **DATA PROTECTION OFFICER (DPO):** The Data Protection Officer (RPD) is the company PA33 Srl, e-mail: [dpo@unisannio.it](mailto:dpo@unisannio.it), P.E.C.: [dpo@cert.unisannio.it](mailto:dpo@cert.unisannio.it), [pa33@legalmail.it](mailto:pa33@legalmail.it).
- **CATEGORIES OF DATA SUBJECTS:** Individuals holding institutional or academic offices and/or members of University bodies (e.g., Academic Senate and Board of Directors).
- **PURPOSE OF PROCESSING AND LEGAL BASIS:** In compliance with the principles of lawfulness, fairness, transparency, adequacy, relevance, and necessity (Art. 5 GDPR), the University of Sannio, as Data Controller, shall process provided personal data to manage the appointment of elected members and academic offices, as well as to verify the absence of any causes of incompatibility. Furthermore, data is processed for transparency purposes as per current legislation within the "Transparent Administration" section of the institutional website. Data may have been originally collected for different purposes (e.g., performance of an institutional task) but are also processed for these purposes due to regulatory obligations.
- **CATEGORIES OF PERSONAL DATA:** The data processed include:
  1. **Identification data:** Contact details and personal data relating to criminal convictions and offenses for the potential consultation of the criminal record;
  2. **Professional and financial data:** Career data, income data, curriculum vitae, offices held, grants, contributions, subsidies, economic benefits, and expenses incurred. This includes, for example, the publication of the C.V. and income status of members of the Board of Directors and the Academic Senate, as well as the C.V. and salary data of the General Manager and Executives.
- **RECIPIENTS AND DATA TRANSFER:** Data processing will take place at the relevant University structures (e.g., Institutional Affairs Office). Data may be communicated to the **MUR** (Ministry of University and Research) for specific bodies, and to student associations.
- **DATA RETENTION PERIOD:** Data will be stored by the University for a period not exceeding the achievement of the purposes, in accordance with Art. 5 of the GDPR. Retention times depend on the management context and specific regulations.
  1. Regarding **Transparency obligations:** Information published on the web is governed by legal transparency requirements. The University ensures a balance between publication obligations and data minimization, using pseudonymization or anonymization where necessary. The underlying storage times for the primary data are not dependent on the duration of web publication for transparency.

- **RIGHTS OF THE DATA SUBJECT:** Pursuant to Arts. 15, 16, 17, 18, 19, and 21 of the GDPR, the data subject has the right to:
  1. Request access to their personal data.
  2. Request rectification of inaccurate data or integration of incomplete data.
  3. Request erasure of their personal data or restriction of processing (subject to the conditions and exceptions provided by the GDPR).
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