



Call for Mobility

PNRR-TNE International Mobility Programme - Assessing Constitutional Crisis Impact and Security (IMP-ACCTS)

Project Proposal TNE23-00057 – CUP B61I24000450006

Annex D

Processing of Personal Data

In accordance with Regulation (EU) 2016/679 (General Data Protection Regulation, "GDPR") and Legislative Decree 196/2003, as amended by Legislative Decree 101/2018, the personal data provided by students under the mobility program call for the project named International Mobility Programme-Assessing Constitutional Crisis impactT and Security, henceforth referred to as IMP-ACCTS, (CUP: B61I24000450006), funded by PNRR, will be processed in compliance with the principles of lawfulness, fairness, transparency, and confidentiality.

Art. 1 - Joint Data Controllers

The joint data controller is the University of Siena, with its registered office at Banchi di Sotto no. 55, 53100 Siena, represented by the Rector Prof. Roberto Di Pietra. The contact details of the data controller are:

Email: rettore@unisi.it

PEC: rettore@pec.unisipec.it

The joint data controller is the University of Cagliari, with its registered office at Via Università no. 40, 09124 Cagliari, represented by the Rector Prof. Francesco Mola. The contact details are:

Email: privacy@unica.it

PEC: protocollo@pec.unica.it

The joint data controller is the University of Milano-Bicocca, with its registered office at Piazza dell'Ateneo Nuovo no. 1, 20126 Milano, represented by the Rector Prof. Giovanna Iannantuoni. The contact details are:

Email: rettorato@unimib.it

PEC: ateneo.bicocca@pec.unimib.it

The joint data controller is the University of Salento, with its registered office at Piazzetta Tancredi no. 7, 73100 Lecce, represented by the Rector Prof. Fabio Pollice. The contact details are:

Email: rettore@unisalento.it

PEC: amministrazione.centrale@cert-unile.it



Art. 2 - Data Protection Officer (DPO)

The Data Protection Officer (DPO) of the University of Siena is Dr. Chiara Silvia Armida Angiolini. She can be contacted at the email address rpd@unisi.it or via certified email at rpd@pec.unisipec.it for any matters concerning the processing of personal data.

The DPO of the University of Cagliari can be reached at dpo@unica.it or via certified email at protocollo@pec.unica.it for any matters concerning the processing of personal data.

The DPO of the University of Milano-Bicocca is Dr. Emanuela Mazzotta. She can be reached at rpd@unimib.it or via certified email at rpd@pec.unimib.it for any matters concerning the processing of personal data.

The DPO of the University of Salento is Dr. Giuseppina Campanile. She can be reached at dpo@unisalento.it or via certified email at amministrazione.centrale@unicert-unile.it for any matters concerning the processing of personal data.

Art. 3 - Purposes of Processing

The personal data collected will be processed for the following purposes:

- Management of student participation in international mobility programs;
- Organization of activities related to mobility, including contacts with partner universities;
- Fulfillment of administrative and legal obligations;
- Administrative management of the IMP-ACCTS project;
- To assert, exercise, or defend a legal right.

Art. 4 - Legal Basis for Processing

The legal basis for the processing of personal data is:

- Art. 6, para. 1, lett. a) of the GDPR: explicit consent of the data subject for one or more specific purposes;
- Art. 6, para. 1, lett. b) of the GDPR: processing is necessary for the performance of the mobility program participation contract or pre-contractual measures;
- Art. 6, para. 1, lett. c) of the GDPR: processing is necessary to comply with legal obligations to which the data controller is subject, particularly in education, international cooperation, and student safety;
- Art. 6, para. 1, lett. e) GDPR: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller.

The processing of personal data belonging to "special categories" (formerly "sensitive data") capable of revealing "racial or ethnic origin, political opinions, religious or philosophical





beliefs, trade union membership, as well as genetic data, biometric data for uniquely identifying a natural person, health data, or data concerning a person's sex life or sexual orientation" (Article 9 Reg. EU 2016/679) will be carried out based on at least one of the exceptions provided for in Art. 9 Reg. EU 2016/679:

- The explicit consent of the data subject for one or more of the purposes listed in section III of this information notice;
- The necessity to assert, exercise, or defend a legal right.

Art. 5 - Processing Methods

Personal data will be processed using electronic and paper-based methods, and appropriate technical and organizational measures will be adopted to ensure data security and protection against unauthorized access, loss, or disclosure.

Webex platforms will be used among the processing methods, for which the following link provides the [relevant privacy policies](#).

Art. 6 - Data Recipients

Personal data may be shared with:

- Partner universities, both within and outside the European Union, in managing the mobility program;
- Public authorities and other entities, as required by law, for control, security, and legal compliance purposes.

In the event of data transfers to third countries, all appropriate measures will be taken to ensure an adequate level of protection for personal data, in compliance with Articles 44-49 of the GDPR. For such transfers, the University will evaluate the existence of an adequacy decision by the European Commission, and, in any case, ensure the legality of the transfer under the applicable regulatory conditions.

Art. 7 - Data Retention Period

Personal data will be retained for the time strictly necessary to manage the purposes for which it was collected and any related legal retention obligations. After this period, the data will be deleted or anonymized.

Art. 8 - Rights of Data Subjects

Each data subject may exercise all rights provided for in Articles 15 and following of Reg. EU 2016/679 (GDPR), particularly:

- Access to personal data and all other information mentioned in Article 15 of the GDPR;
- Rectification of inaccurate data and/or supplementation of incomplete data as per Article 16 of the GDPR;



- Erasure ("right to be forgotten") as provided for by law, particularly Article 17 of the GDPR;
- Restriction of processing in the cases outlined in Article 18 of the GDPR;
- Objection to processing as per Article 19 of the GDPR;
- Data portability, where applicable, as per Article 20 of the GDPR.

As prescribed by European regulations, data subjects also have the right to withdraw consent at any time, without affecting the lawfulness of processing based on the consent provided before the withdrawal.

Art. 9 - How to Exercise Rights and File Complaints with the Data Protection Authority

If the data subject wishes to exercise the rights described above, they may contact the data controller using the contact details provided in point 1 of this notice.

A response will be provided as quickly as possible. The Regulation provides that the response be given within one month of the request, which may be extended by two additional months if necessary, considering the complexity and number of requests.

The data subject also has the right to file a complaint with the Supervisory Authority in accordance with Article 77 of Reg. EU 2016/679. In Italy, the role of the Supervisory Authority is exercised by the Data Protection Authority (<https://www.garanteprivacy.it>).

Art. 10 - Provision of Data and Consequences of Refusal

The provision of the requested personal data is necessary for the assignment of mobility scholarships and related funding. Failure to provide such data will make it impossible to proceed with the scholarship assignment and the provision of the financial contributions. The data will be processed exclusively for the purposes mentioned in section III of this information notice.

The refusal to provide the necessary data will prevent the data controller/joint controllers from assigning the mobility scholarship, providing financial contributions, and fulfilling the associated legal obligations.

The provision of data belonging to special categories is optional.