INFORMATION PURSUANT TO THE GENERAL DATA PROTECTION REGULATION – EU REGULATION 2016/679 AND "DATA PROTECTION CODE", LEGISLATIVE DECREE NO. 196/2003 AND FOLLOWING AMENDMENTS AND ADDITIONS – ONLINE REGISTRATION SERVICE FOR COMET EVENT

The data provided for the online registration to the COMET conference, held in the University's physical and virtual classrooms, are processed in compliance with the General Data Protection Regulation - EU Regulations 2016/679 (hereafter the Regulation) and with the "Data Protection Code", Legislative Decree no. 196/2003 and following amendments and additions. This information is provided in compliance with the General Data Protection Regulation – EU Regulation 2016/679.

#### 1. Data Controller and Data Processor

The Data Controller is the University of Insubria, represented by the Rector, legal head office in Varese (VA), Via Ravasi, 2, Certified email <a href="mailto:ateneo@pec.uninsubria.it">ateneo@pec.uninsubria.it</a>. Data subjects may contact the Data Processor to exercise the rights provided for by the GDPR (articles 12-21) at the following email address: <a href="mailto:privacy@uninsubria.it">privacy@uninsubria.it</a>.

The updated list of the Data Processors and of the people in charge of the processing is held in the offices of the Data Controller.

#### 2. Processed data

Processed data include:

- personal and contact details (name, surname, email address);
- navigation data: the IT system and software procedures connected to the functioning of the Microsoft Forms tool acquire, as part of their normal operation, some personal data, whose transfer is implicit in the use of the protocols of Internet communication. These include information which is not collected to be associated with specific data subjects and which will be processed through elaborations and associations with data held by third parties to identify the users, only in order to verify responsibilities in case of hypothetical cyber crimes towards the service or its users.

The online registration form to the event was created using the Microsoft "Forms" IT tool and provided with the specific Microsoft information, whose link is available at the bottom of the page.

# 3. Processing purpose and legal basis

#### 3.1 Contractual and institutional purposes

- a) registration for events in the University's physical and virtual classrooms;
- b) communications in relation to the organization of the events (e.g. date changes);

#### 3.2 Mandatory purposes

a) application of work environments safety measures according to the provisions of the Legislative Decree 81/2008;

The legal basis of this processing operation, pursuant to article 6, paragraph c) of the GDPR, is the need to fulfill a contract to which the subject is party or the implementation of pre-contractual measures adopted upon the request of the same.

The legal basis for processing, pursuant to article 6, paragraph c) of the GDPR, may also be the need to comply with a legal obligation which the Data Controller is subject to.

## 4. Compulsory and non-compulsory data

Providing data for the purposes described in paragraphs 3.1 and 3.2 is mandatory. Refusal to provide them entails the impossibility to access the online registration service for events held in the University's physical and virtual classrooms.

# 5. Data processing methods

The processing of personal data will take place by using manual, IT and Internet tools which guarantee the security and privacy of the data themselves.

Specific security measures are followed to prevent data loss, unlawful or incorrect use of data and non-authorized access, in full compliance with article 32 of the GDPR.

Data are collected with respect for the principles of lawfulness, fairness, relevance, completeness and non-redundancy with regard to the purposes for which they are processed.

## 6. Data retention period

Personal data are stored according to the following criterion:

- as long as strictly necessary to fulfill the purposes connected to carrying out the events held in the University's physical or virtual classrooms for which they were processed;

At the end of the retention period, the data provided will be deleted or anonymized.

# 7. Subjects or subject categories to whom the data may be communicated or who may receive them as autonomous Data Controllers, Data Processors or people in charge of the processing

Data processed for the abovementioned purposes will anyway be accessible to the event organizers, employers and collaborators assigned to the qualified offices of the University of Insubria, who are authorized to the processing following article 29 of the Regulations 2016/679. Personal data will not be disseminated. The management and retention of the personal data thus collected will take place within the University and/or providers of services which are necessary for their technical-administrative management, which, at the end of the requested performance, may acquire the personal data of the subjects who are appointed as Data Processors pursuant to article 28 of the GDPR.

The complete and updated list of the Data Processors is freely accessible from the Data Controller offices.

## 8. International data transfers

Data are not subject to international transfer.

# 9. Rights of the data subjects

Should they be exercisable, the rights toward the University of Insubria (Data Controller) are the following:

- right to access personal data and all information described in Article 15 of the GDPR;
- right to rectify inaccurate personal data and integrate incomplete ones;
- right to erase personal data, except for those contained in acts which the University must necessarily store and only when there is a legitimate reason to proceed with processing;
- right to restriction of processing in the cases described in article 18 of the GDPR;
- right to data portability in a structured and common format which is readable by an electronic device, such as .xml or similar formats;
- right to object to the processing of personal data;

- right to withdraw their consent for the processing of non mandatory data, without affecting the lawfulness of the processing based on consent before its withdrawal.

Data subjects may exercise their rights by contacting the Data Processor and sending the request via email at <a href="mailto:privacy@uninsubria.it">privacy@uninsubria.it</a>.

## 10. Complaints

With relation to non-compliant data processing, data subjects may also submit a complaint to the Italian Data Protection Authority (<a href="www.garanteprivacy.it">www.garanteprivacy.it</a>) or to the Data Protection Supervisor of the EU State in which the subject usually lives or works, or of the State where the alleged violation took place.