



**Information for the personal data processing in relation to the use of the platform “Pago PA – University of Insubria” for payments to the University through the circuit “Pago PA – Payment Node” according to General Regulation on data protection (GDPR, General Data Protection Regulation- EU Regulation 2016/679, later “GDPR”), and according to legislative decree. June 30rd 2003, n. 196 as modified by legislative decree 101/2018**

The University, as a public administration and as required by the law, adheres to pagoPA the electronic payment system designed to make any kind payment to the Public Administration in a simpler, safer and transparent way

The personal data provided to the University of Insubria in relation to the use of the "Pago PA - University of Insubria" platform are processed in accordance with the General Data Protection Regulation - EU Regulation 2016/679 and the Legislative Decree n. 196/2003 and s.m.i. "Code regarding the protection of personal data" as amended by Legislative Decree n. 101/2018.

This information is provided, according to General Regulation on data protection (GDPR, General Data Protection Regulation- EU Regulation 2016/679 to those who interact with the “Pago PA - University of Insubria” service of the Università degli Studi dell'Insubria accessible electronically starting from the address:

<https://www.uninsubria.it/pagopa> corresponding to the homepage of the service.

The information is provided only for the "Pago PA - University of Insubria" service, not for other websites that may be consulted by the user through hyperlinks.

## **1. DATA CONTROLLER, DATA PROTECTION OFFICER (DPO)**

The data controller is the University of Insubria, in the person of the Rector. The contact details of the Data Controller are: [atenco@pec.uninsubria.it](mailto:atenco@pec.uninsubria.it)

According to article 37 e ss. of the EU Regulation 2016/679, the University of Insubria has nominated the Data Protection Officer (/DPO). The contact details of the Data Protection Officer (DPO) are: [privacy@uninsubria.it](mailto:privacy@uninsubria.it), [privacy@pec.uninsubria.it](mailto:privacy@pec.uninsubria.it)

The updated list of data processors and authorized users is kept at the headquarters of the data controller.

## **2. DATA PROCESSING**

The processed data provided by the data subject to make payments to the University through the PagoPA circuit are:

- a) Personal data and contact details (name, surname, fiscal code, permanent address, current address, e-mail address);
- b) data relating to the transaction for the payment that is intended to be made in favour of the University (transaction\_ID, transaction outcomes, payment notice number, amount, deadlines, payment reasons, payment date);
- c) browsing data: the computer systems and software procedures relating to the functioning of the “Pago PA - University of Insubria” platform acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated



with identified data subjects, but by their very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes the IP addresses or domain names of the computers used by users connecting to the service, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numeric code indicating the status of the response given by the server (success, error, etc.) and other parameters relating to the operating system and the user's IT environment.

The University of Insubria, as Data Controller, will process the personal data provided by the data subject for payments due to the University.

### **3. PROCESSING TASKS and LEGAL BASIS**

The data you will provide the data controller with, will be collected and processed for the following purposes:

#### **3.1 Contractual tasks**

- a) allow access to the service and its contents for the management of the registration process to the "Pago PA - University of Insubria" platform;
- b) management of the procedure for making a payment to the University by using the services of the Payment Node;

#### **3.2 Legal obligations**

- a) fulfillment of the obligations deriving from the University's adhesion to the PagoPA Payment Node;
- b) for pursuing the public interest in response to requests from the Judicial Authority and the Judicial Police in relation to investigative activities;
- c) for the ascertainment of computer crimes for the fulfillment of specific requests by the Judicial Authority and the Judicial Police in relation to investigative activities.

#### **3.3 Legitimate interest**

- a) with regard to browsing data, these are used solely for the purpose of obtaining anonymous statistical information on the use of the service, checking its correct functioning, carrying out monitoring activities to support the safety of the service and identifying actions for the improvement of the service.

The legal basis of the data processing, according to art. 6, paragraph 1 letter b) of GDPR, is the need to carry out the execution of a contract of which the data subject is a party or to the execution of pre-contractual measures adopted at the request of the same, according to art. 6, paragraph 1, letter c), is the need to fulfill a legal obligation to which the Data Controller is subject (Legislative Decree n.82 / 2005 "Digital Administration Code", DL n.179 / 2012) , as well as, according to art. 6, paragraph 1, letter e), the need to fulfill tasks of public interest with which the Data Controller is invested.

### **4. COLLECTION METHODS**

Data collection is performed in compliance with the principles of lawfulness, correctness, relevance, completeness and not over estimation in relation to the tasks they are processed for. Personal data are processed in compliance with the principles of lawfulness, fairness and transparency, as required by law, with the aid of instruments to record and store the data and in

any case to guarantee the safety and to protect the privacy of the data subject. Specific safety measures are taken to prevent the loss of data, illicit or incorrect use and unauthorized access in full compliance with the art. 32 of the GDPR.

## **5. DATA STORAGE PERIOD**

Personal data are stored according to the following criteria:

- for the period strictly needed to achieve the purposes connected with the performance of the obligations necessary for the full implementation of the relationship for which they are processed or for the period strictly needed for the fulfillment of the storage obligations imposed by civil, accounting, tax and regulatory laws.

At the end of the storage period, the data provided will be deleted, or made anonymous.

## **6. DATA TRANSFER**

Data processed for the above-mentioned tasks may be disclosed to the administrative staff of the University of Insubria (Art. 29 GDPR 2016/679) duly authorized by the Data Controller.

Data processed for the above-mentioned tasks of paragraph 3 will be disclosed to the bank managing the University's treasury service: Banca Popolare di Sondrio operating as an independent data controller.

The university may also transfer personal data to other public bodies if they have to process the same for any procedures of its institutional competence as well as to all those public subjects to which, in the presence of the related prerequisites, the data transfer is obligatory by EU or national laws or regulations

The management and storage of personal collected data takes place at the University and / or at services suppliers needed for the technical-administrative management which, for the sole purpose of the service requested, could become aware of the personal data of the data subjects, appointed as Data Processors pursuant to art. 28 of the GDPR.

The complete and updated list of data processors is available on request from the Data Controller.

The data will not be disseminated.

## **7. TRANSFERS OF PERSONAL DATA ABROAD**

Personal data will not be transferred abroad.

## **8. Rights of the data subject**

According to Art. 15, 16, 17, 18 and 20 of the GDPR, the Data Subject rights against the University of Insubria as Data Controller are:

- Right of access to all personal data and information;
- Right to rectification of all personal data and information by the data subject;
- Right to erasure of all personal data and information except for those contained in documents that must be stored by the University and unless there is a legitimate overriding reason to proceed with the processing;
- Right to restriction of processing;
- Right to object to processing of personal data
- Right to data portability;
- Right to revoke any consent given for non-mandatory data processing.



To exercise these rights, the Data Subject may contact the Data Protection Officer by e-mail to: [privacy@uninsubria.it](mailto:privacy@uninsubria.it).

## **9. Claim**

The Data Subject has the right to claim to the Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)) or to the EU State Authority where the data Subject usually resides or works, or to the place where the violation occurred, in relation to a non-compliant data processing.