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**INFORMATION ON THE PROCESSING OF PERSONAL DATA
FOR CANDIDATES FOR ADMISSION,
STUDENTS ENROLLED IN PhD PROGRAMS ADMINISTERED BY UNIPV,
AND PhD GRADUATES
pursuant to Art. 13 of Regulation (EU) 2016/679 - GDPR**

Data Controller

The Data Controller is the University of Pavia, represented by its Rector (C.so Strada Nuova 65, 27100 Pavia, certified email: amministrazione-centrale@certunipv.it).

The University of Pavia, as the Data Controller, informs candidates for admission to doctoral programs, students enrolled in the program, and postdoctoral researchers regarding the processing of their personal data, collected from the data subjects themselves or from schools and universities attended before or during their university career.

The data is processed exclusively for the performance of the University's institutional activities and for the provision of educational, administrative, and support services related to doctoral programs.

The processing may also concern, where necessary and within the limits established by applicable legislation, special categories of personal data, such as data relating to health or other personal conditions relevant to the provision of services or benefits related to the university program.

Data Protection Officer

The University of Pavia has appointed a Data Protection Officer (DPO). Contact details are:

- University of Pavia, Corso Strada Nuova n. 65, Pavia
- Email: privacy@unipv.it
- Certified Email: amministrazione-centrale@certunipv.it.

Purpose of processing – legal basis

The personal data collected and processed are:

- a. those provided by users upon online registration, application for PhD program admission tests, enrollment; during their academic career; upon submission of the application for graduation;
- b. tax and salary information entered online upon first enrollment or registration in subsequent years, or provided for the purposes of paying university fees or receiving PhD scholarships;
- c. data provided from time to time by users in relation to the specific service requested;



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- d. data relating to their academic career;
- e. any data received from third parties for the purpose of providing services or benefits related to their university career (e.g., right-to-education organizations - EDISU).

The data will be processed for institutional purposes, specifically for:

- Management of selection and admission procedures.
- Management of the academic and administrative career.
- Provision of educational, administrative, and support services.
- Management of evaluation procedures and the awarding of the degree.
- Fulfillment of obligations provided for by current legislation.
- Participation in student representation elections.

Data may also be processed for archiving purposes in public interest, for scientific or historical research, and statistical analysis. In aggregated or anonymized form, data may be used for studies aimed at improving services.

The legal basis for the processing is Article 6, paragraph 1, letters e) and c) of EU Regulation 2016/679, as the processing is necessary for the performance of tasks carried out in public interest or in the exercise of official authority vested in the University, also pursuant to its Statute.

If the processing concerns special categories of personal data, it is carried out in compliance with Art. 9 of Regulation (EU) 2016/679 and applicable regulatory provisions, when necessary for reasons of substantial public interest or to fulfill obligations under the legislation on university education, the right to education, and inclusion.

Personal data may also be processed for IT security purposes and to protect the University's technological infrastructure, to guarantee the integrity, availability, and confidentiality of information systems and processed data, as well as to prevent unauthorized access, improper use of digital services, or illegal activities.

Processing is carried out mainly using computer and electronic tools, and occasionally on paper, adopting adequate technical and organizational measures to guarantee security and confidentiality.

Processing within collaborations with other entities

In the activation, management, and implementation of PhD programs, the University of Pavia may collaborate with other universities, public or private entities, research institutions, businesses, or funding bodies.

Depending on the role played by these individuals within the PhD program, the processing of personal data may take place according to different legal classifications.

1. **Processing carried out by external parties as Data Processors (Article 28 of the GDPR)** - The University may use external parties to perform specific technical or



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administrative activities related to the management of university services. These parties process personal data on behalf of the University and are designated as Data Processors pursuant to Article 28 of Regulation (EU) 2016/679. These include, for example, CINECA, which provides IT services and platforms used to manage administrative procedures and university careers.

2. **Disclosure of data to third-party independent data controllers** - Personal data may be disclosed to public or private entities acting as independent data controllers when such disclosure is required by law or necessary for the performance of tasks of public interest or for the performance of the University's institutional activities, as well as for the management of agreements, programs, or funding related to doctoral programs.
3. **Processing carried out under joint control (Article 26 of the GDPR)** - In some cases, PhD programs may be activated or managed under agreements with other universities or public or private entities, with which the purposes and means of processing personal data relating to the program management are jointly determined. In such cases, processing occurs under joint control pursuant to Article 26 of Regulation (EU) 2016/679.

Information regarding the joint controllers, the purposes of the joint processing, the allocation of responsibilities, and the contact point for exercising data subjects' rights is made available in the documentation relating to the individual doctoral programs operated under joint control.

Joint control concerns only the processing strictly necessary for managing the activities covered by the specific agreement relating to PhD program. For all further processing, each entity involved acts as an independent data controller.

Nature of data provision and consequences of refusal

The provision of data is, in general, mandatory. Failure to provide the data required for managing your university career or for administrative obligations required by law will make it impossible to establish or continue your relationship with the University or to use the requested services.

Categories of parties to whom data may be disclosed – Data recipients

Personal data may be processed by university staff and collaborators authorized to process data in the performance of their respective institutional functions.

Personal data may be disclosed to public or private entities when necessary for the performance of the university's institutional activities or required by applicable law.



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These entities process personal data in compliance with applicable data protection legislation and, depending on the case, may act as independent data controllers, data processors, or joint controllers within the scope of the University's institutional activities, including, but not limited to:

- Ministry of University and Research for inclusion in the National Student Registry pursuant to Law No. 170/2003 and subsequent regulatory provisions;
- ANVUR;
- Ministry of Economy and Finance;
- Ministry of Labor;
- Local authorities;
- State Attorney's Office, judicial authorities, and other competent authorities;
- INPS;
- Funding agencies or entities that provide PhD scholarships;
- Insurance companies for the management of accident claims;
- Right to Education organizations (EDiSU);
- Affiliated banks for the management of university tuition fees and PhD scholarship payments;
- Public or private entities involved in research activities, PhD projects, or PhD programs in collaboration with companies;
- Other public or private entities as required by law.

The data may also be disclosed to universities, research institutions, companies, or other entities involved, in various capacities, in the activation, financing, or implementation of the PhD program or the PhD student's training program.

Disclosure of data belonging to special categories occurs exclusively in the cases provided for by applicable legislation.

Personal data may be transferred to countries outside the European Economic Area if necessary for the University's institutional activities or as part of academic or scientific collaborations with universities or partner institutions. In such cases, the transfer will take place in compliance with the provisions of Articles 44 et seq. of Regulation (EU) 2016/679 and any adequacy decisions or other guarantees provided by applicable law.

Some personal data may be made public in the cases provided for by applicable law or as part of the University's institutional activities (for example, in relation to the publication of PhD theses, participation in research projects, or scientific publications).

Retention

Personal data is retained for the time necessary to achieve the purposes for which it was collected and in any case in compliance with the regulations on the retention of administrative and archival documentation applicable to public bodies.



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Data Subject Rights

Data subjects have the right to request from the data controller access to their personal data, rectification or erasure of such data, restriction of processing concerning them, or to object to such processing (Articles 15 et seq. of EU Regulation 679/2016). The request may be submitted in writing to the University of Pavia, or through the Data Protection Officer (DPO), Corso Strada Nuova n. 65, Pavia, or by certified email to amministrazione-centrale@certunipv.it.

Data subjects, where applicable, also have the right to lodge a complaint with the Data Protection Authority (Garante) in accordance with the procedures set forth in Article 77 of EU Regulation 679/2016, or to take action pursuant to Article 79 of the Regulation.

Further information is published at <https://privacy.unipv.it/>.

March 25, 2026