



Information required by EU Regulation 2016/679 (GDPR) on the processing of data for the purpose of curricular and extra-curricular traineeship

FOREWORD

The Free University of Bozen/Bolzano (hereinafter also referred to as "unibz") considers the protection of personal data to be of fundamental importance, guaranteeing that personal data is processed in full compliance with the protections and rights granted by EU Regulation 2016/679 (hereinafter also referred to as the "Regulation" or "GDPR"), with further national and EU regulations as well as with the Provisions of the Supervisory Authority. The processing of personal data carried out is inspired by the principles of lawfulness, correctness and transparency and uses the minimum set of data for the period of time strictly necessary. As required by the GDPR, in accordance with the principle of transparency, the following information is provided.

	Data controller	Free University of Bozen-Bolzano, with registered office at Piazza Università 1, 39100 Bozen-Bolzano, in the person of the President and legal representative pro tempore.
	(DPO, Data Protection Officer)	The DPO can be contacted at the following e-mail address privacy@unibz.it




SOURCE AND TYPE OF PERSONAL DATA PROCESSED

The data is collected directly from the data subject in accordance with the principles of data minimisation and storage limitation.

The personal data processed include the following:

- personal details;
- contact details (mobile phone, landline, email);
- for curricular traineeship activities: career data, any additional skills or abilities, including language skills, and any extracurricular data that the student intends to declare in order to increase the possibilities of carrying out the traineeship activity with host organisations that are more suited to his/her overall skills;
- for extracurricular training activities: educational qualifications and professional qualifications relevant and/or preparatory to the training course, if any, already obtained;
- data relating to the state of health in order to allow the management of any interruptions of the activity for proven health protection needs;
- particular data that the student has declared during his university career for the purposes of applying the extension to 24 months of the traineeship period in cases of disability, in order to take care of his rights in identifying the appropriate training project.

 PURPOSE	LEGAL BASIS	NOTES & STORAGE TIME
<ul style="list-style-type: none"> • activation of agreements between unibz and host organisations • management of curricular and extracurricular training activities 	<ul style="list-style-type: none"> • Article 6.1.e) GDPR performance of a task carried out in the public interest or in the exercise of official authority; • Art. 6.1.b) GDPR performance of a contract to which the data subject is part (in the case of Erasmus: pre-contractual or contractual measures); • Art. 6.1.c) GDPR legal obligations; • only for curricular traineeships: Art. 9.2.g) GDPR processing necessary for 	<p>The data are stored and processed in such a way as to guarantee their security and confidentiality in full compliance with the provisions of the GDPR and the relevant national legislation and internal university regulations, and may be carried out by means of manual operations and/or the use of IT and/or telematic tools to store, manage or transmit the data.</p> <p>The storage period is unlimited as regards the data required for the</p>

	<p>reasons of substantial public interest on the basis of the law of the Union or of the member state and art. 2 sexies paragraph bb) D.lgs. 196/2003.</p> <p>Unibz, in implementation of Law 196/97, DM 142/98, DM 270/2004 has provided, in the didactic offer of the study courses, training activities aimed at facilitating professional choices to be made through curricular internships.</p> <p>Traineeship activities are part of the University's duty to promote the integration of its students into the world of work, as provided for in Article 11, paragraph 4 of Ministerial Decree 270/2004, in the General Regulations (ex 270/2004), in the General University Traineeship Regulations, the Traineeship Regulations of the Master in Primary Education and the Traineeship Regulations Bachelor in Social Education and Social Work. They can also be carried out as part of Erasmus+ Traineeship programmes, with the student participating in a call for applications published by the university. In this case, it is the call for applications that defines the additional data processing procedures required for the application and subsequent management of the Erasmus mobility activity.</p> <p>For the activities of extracurricular traineeships further normative references are the L. 92/2012, the State-Regions-Conference of 25.05.2017: Agreement between the Government, the Regions and Autonomous Provinces of Trento and Bolzano on the document containing Guidelines on training and orientation traineeships.</p>	<p>validity of the student's curricular traineeship activity in the student's curriculum, given that the traineeship activity is recognised in the student's career.</p> <p>For processing operations that are preliminary to or functional to the implementation of the curricular or extracurricular training activity or for the management of insurance or accident practices, the retention periods are determined by the regulations of the sector (at least 10 years, except in the event of litigation). The retention period of the data contained in the placement agreement and in the individual training project may be envisaged, if necessary, by the placement agreement, in accordance with the maximum rejection period.</p>
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OBLIGATION TO PROVIDE DATA AND CONSEQUENCES OF NOT PROVIDING THEM

The provision of data for the above-mentioned purposes is required in order to carry out the curricular and/or extracurricular training activity. Refusal to provide the data will **not** allow the carrying out of the curricular and/or extracurricular training activity.



RECIPIENTS AND AUTHORISED PROCESSORS

The data can be **communicated** to:

- Region, Autonomous Province of Bolzano – South Tyrol, Autonomous Province of Trento or regional agency for job placement;
- Public bodies (Region INAIL, schools of all levels and grades, etc., host subject if a public administration), trade unions and trade union representatives;
- Insurance agencies for third party liability coverage and travel insurances;
- Private subjects (candidates and host subjects);
- in the case of Erasmus: Indire agency, Erasmus-Consortium members, and host subject located in EU territory or in any case partner of the Erasmus+ project;
- at the request of the data subject or in cases where the curricular traineeship is compulsory, to accredited or authorised public and private operators and potential employers for the purposes of orientation and integration into the world of work (pursuant to Law 30/2003 on employment);
- subjects who host the trainee and who, in their capacity as Data Processors or authorised persons, process data in order to certify the achievement of the student's training objectives (e.g. attendance, activities carried out, etc.);

Personal data will be **processed**:

- by employees and collaborators in various positions at unibz, for this purpose duly appointed as authorised persons to process data, who operate under the direct authority of the Data Controller, who has instructed them accordingly;
- by the host, for this purpose duly appointed as data processor pursuant to art. 28 GDPR for processing activities related to:
 - the possible management of the student's attendance registers;
 - the possible traineeship agreement with the host institution
 - the drafting, keeping and transmission of the assessment form of the placement activity;
 - the processing of personal data in the event of any accidents,
 carried out within the scope of the agreement on training activities. For these activities, the host company learns about and processes curricular data, data relating to attendance and assessment and also special categories of data, e.g. in the case of disabled students, whose confidentiality, integrity and availability must be guaranteed by the host company.



TRANSFER OF PERSONAL DATA TO COUNTRIES TO THIRD COUNTRIES

The Data Controller avails itself of professional services offered by certain cloud providers suitably qualified as Data Processors. Therefore, it is possible that the data is transferred to third countries, but only:

- to third countries or international organisations for which the European Commission has issued an adequacy decision pursuant to Art. 45 of the GDPR;
- to countries outside the EEA, after signing the standard contractual clauses (Standard Contractual Clauses) adopted/approved by the European Commission pursuant to Art. 46 GDPR, 2, lett. c) and d) and adoption of the appropriate guarantees;
- towards subjects that have an international organization and that have provided for the subscription, at group level, of specific Binding Corporate Rules, as per art. 47 of the GDPR;
- in cases provided for in Article 49 of the GDPR: where the data subject has given the explicit consent, in the performance of a contract or pre-contractual measures, to protect important reasons of public interest, to establish or defend legal claims, to protect the vital interests of a data subject or other persons and the data subject cannot give the consent (e.g. specific request by the student, participation in an Erasmus+ Traineeship call).




RIGHTS OF THE DATA SUBJECTS (ARTICLES 15-22 OF THE GDPR)

The data subject has the right to obtain from the data controller confirmation as to whether or not personal data concerning him/her are being processed and, where applicable, to request access to and rectification or erasure

of personal data or restriction of processing of personal data concerning him/her or to oppose their processing - unless required by law - as well as the right to data portability.

In order to exercise these rights, the data subject may use the form that can be downloaded from the "Privacy" page on the institutional website and send it to privacy@unibz.it.

The data subject also has the right to lodge a complaint with a Supervisory Authority.

	<p>PROFILING AND OTHER PURPOSES</p> <p>The controller does not carry out any data profiling.</p> <p>Where the controller intends to further process the personal data for a purpose other than that for which they were collected, the controller shall, prior to such further processing, provide the data subject with information about that other purpose and any further relevant information.</p>
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