

**Privacy Information Notice pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR)**

**1. Data Controller**

The Data Controller is **University of Bologna**, with registered office at **80007010376** , Tax Code/VAT Number **80007010376**.

You can contact the Data Controller at the following email address: [privacy@unibo.it](mailto:privacy@unibo.it).

**2. Data Protection Officer (DPO)**

The Data Controller has appointed a Data Protection Officer (DPO), who can be contacted at: [dpo@unibo.it](mailto:dpo@unibo.it).

**3. Purposes of Processing, Legal Bases, and Data Retention Periods**

	<b>Purpose of Processing</b>	<b>Categories of Personal Data Processed</b>	<b>Legal Basis for Processing (Art. 6 GDPR)</b>	<b>Data Retention Period</b>
<b>A.</b>	Application, evaluation, and participation: manage your application, evaluate your eligibility, and administer your participation in the course, including all related educational and administrative activities.	Identification and contact data (name, surname, email, address) Personal details (gender, age) Academic and professional data (educational background) Identification documents (ID, passport) Competence assessment results	Article 6(1)(b) GDPR: processing is necessary for the performance of pre-contractual measures taken at your request and for the performance of the contract to which you are a party.	For the entire duration of the course. For non-admitted candidates, data will be retained for 24 months for administrative purposes. For admitted candidates, data will be retained for the duration of the course and for a subsequent period of 10 years in compliance with legal obligations. For the time period applicable by law for the conservation of academic record.

B.	Compliance with Legal Obligations: comply with legal, accounting, and tax obligations to which the Data Controller is subject.	Identification and contact data Administrative and payment data	Article 6(1)(c) GDPR: processing is necessary for compliance with a legal obligation to which the controller is subject.	For the entire duration of the Master program and for 10 years after its conclusion, in compliance with legal and fiscal retention obligations.
C.	Marketing Activities: send you newsletters and promotional communications about future courses and services offered exclusively by the Data Controller	Contact data (email address)	Article 6(1)(a) GDPR: the data subject has given explicit, free, specific, and informed consent for this specific purpose.	Until the withdrawal of your consent, and in any case for no longer than 24 months from your last recorded interaction.

#### 4. Categories of Recipients and data flow

To enable your full participation in the project and its educational offerings, your personal data will be communicated to specific recipients who act as independent data controllers or data processors. The data flows are as follows:

- **POLI.design:** your personal data will be communicated to POLI.design S.c.r.l., which acts as an Independent Data Controller for the purposes of central coordination and administrative management of the AI4Gov X project. This sharing is necessary to enable subsequent data flows required for your participation, such as sharing with Dokimazo for the issuance of Open Badges and with other project partners for educational and monitoring purposes. The data shared will include identification data, contact details, academic records, and other information necessary to fulfil these coordination tasks.
- **Dokimazo:** your name, surname, email, address, and educational background will be shared by POLI.design with Dokimazo S.r.l., which acts as a Data Processor under Art. 28 GDPR. This communication is necessary for the creation of your “skill wallet” the recognition of your competencies, and the issuance of Open Badges.
- **University of Rijeka and FARI (for Monitoring):** your name, surname, email, address, gender, age, educational background, ID/passport details, and competence assessment grades will be shared by POLI.design with the University of Rijeka and

FARI. They act as Independent Data Controllers for the purposes of data archiving, project monitoring, and KPI reporting.

- **University of Rijeka and FARI (for Platform Access):** your name, surname, email, and POLI.design Microsoft credentials will be shared by POLI.design to grant you Single Sign-On (SSO) access to the AI4Scale platform, which is necessary for carrying out exercises during the courses. In this context, they act as Data Processors.
- **Other Delivering Partners:** your name, surname, email, gender, age, and educational background may be shared with other Delivering Partners involved in teaching activities. They will process this data as Independent Data Controllers for the purposes of preparing educational content and assessing your competencies.
- **Service Providers:** Third-party entities providing instrumental services (e.g., IT infrastructure, platform management) to the Data Controller, acting as Data Processors under Art. 28 GDPR.
- **Public Authorities:** Judicial or administrative authorities, where required by law.

## 5. International Data Transfers

Data processing is primarily conducted within the European Economic Area (EEA). Should any data be transferred to recipients outside the EEA, the Data Controller will ensure that such transfers are carried out in full compliance with Chapter V of the GDPR, by implementing adequate safeguards such as Standard Contractual Clauses (SCCs) approved by the European Commission or by verifying the existence of an adequacy decision.

## 6. Rights of the Data Subject

In accordance with Articles 15 to 22 of the GDPR, you as Data Subject have the right to:

- a. obtain confirmation as to whether or not personal data concerning you are being processed;
- b. obtain access to your personal data and to the information indicated in Article 15 of the GDPR;
- c. obtain the rectification of inaccurate personal data or the integration of incomplete personal data;
- d. obtain the erasure of your personal data (right to be forgotten) in the cases provided for by Article 17 of the GDPR;
- e. obtain the restriction of processing in the cases provided for by Article 18 of the GDPR;
- f. receive your personal data in a structured, commonly used, and machine-readable format and to transmit those data to another controller (right to data portability);

- g. object at any time to the processing of your personal data for reasons related to your particular situation.

You also have the:

*Right to Withdraw Consent:* where processing is based on consent (Article 6(1)(a) GDPR), you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. The withdrawal of consent shall be as easy as giving it.

*Right to Lodge a Complaint:* with the competent supervisory authority (in Italy, the Garante per la Protezione dei Dati Personali) if you believe that the processing of your personal data infringes the GDPR.

You may exercise your rights by sending a written request to the Data Controller or the DPO at the contact details provided in Sections 1 and 2.

## **7. Nature of data provision and consequence of refusal**

The provision of personal data for the purposes of application and participation (points A and B in Section 3) is a necessary requirement for entering into and performing the educational contract. Refusal to provide such data will make it impossible for the Data Controller to process your application and manage your participation in the course.

The provision of data for the marketing purpose (point C) is entirely optional and separate from the application process. Your refusal will have no negative consequences on your participation in the course.

## **8. Automated Decision-Making**

The Data Controller does not use automated decision-making processes, including profiling as referred to in Article 22(1) and (4) of the GDPR, that produce legal effects concerning you or similarly significantly affect you.