



Ministry of Education and Merit

NOTICE ON PERSONAL DATA PROCESSING

*within the School Trips Digital Service
for the purposes of recognising the corresponding bonus*

(Articles 13 and 14 of EU Regulation 679/2016)

With this information notice, provided in accordance with Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter, also "**Regulation**" or "**GDPR**"), it is intended to provide you with information on the processing of personal data carried out within the framework of the digital service School Trips (hereinafter "**Digital Service**" or "**Service**"), provided through the "Unica" Platform (hereinafter also referred to as the "**Platform**") and aimed at enabling the widest possible participation of students in initiatives to extend the educational offering, such as educational trips and educational visits, by recognising financial contributions or other types of benefits.

In particular, personal data is processed in order to:

- enable the Ministry of Education and Merit (hereinafter also referred to as the "**Ministry**" or "**MIM**") to proceed to (i) identify the School Institutions benefiting from economic resources to support participation in educational trips and visits, and (ii) distribute the financial contributions among the Institutions themselves;
- enable institutes and schools of all levels and educational institutions (hereinafter also referred to as "**School Institutions**"), which have been allocated the resources referred to in the preceding point, to manage the contribution applications submitted by the interested parties and to proceed with the allocation.

The process carried out within the School Trips Digital Service therefore consists of two phases:

- a) the first phase, outside the Platform, is the responsibility of the Ministry and concerns the allocation of economic resources between the individual school institutions;
- b) the second phase, managed within the Platform, is the responsibility of the individual School Institutions and concerns the application for the granting of concessions by parents/exercisers of parental responsibility (hereinafter also referred to as '**Users**' or '**Interested Parties**').

This notice concerns the processing carried out within the framework of the first stage referred to in (b) above.

With regard to the processing referred to in (a) above, please refer instead to the specific notice issued by the Ministry.

Data controllers

The School Institutions are the data controllers of the personal data (hereinafter, also "**Data Controllers**") carried out for the purpose of providing the School Trips Digital Service, each with respect to its own users.

Data processor

Pursuant to Article 28 of the GDPR and the Ministerial Decree of 10 October 2023, no. 192, containing "the regulations on the processing of personal data carried out by the Ministry of Education and Merit and by the Educational Institutions within the framework of the Platform provided for in Article 21, paragraphs 4-ter et seq. of the Decree-Law of 22 June 2023, no. 75, converted, with amendments, by the Law of 10 August 2023, no. 112", the Ministry acts as the party responsible for the processing of personal data (hereinafter, also the "Data Processor" or "Processor") in the activity of managing the infrastructure through which the School Institutions provide the School Trips Digital Service.

Sogei S.p.A. (Via Mario Carucci 99, 00143, Rome), in its capacity as the entrusted party for the infrastructural, management and application development services of the Ministry's information system, acts, pursuant to Article 28 of the GDPR, as Sub-Data Processor.

Data Protection Officers

For the person appointed as Data Protection Officer and their contact details, please contact the relevant institution.

Legal basis for processing

The legal basis for the processing is the performance of a task carried out in the public interest or in connection with the exercise of public authority vested in the data controller, pursuant to Article 6(1)(e) and (3)(b) of the GDPR, Article 2-ter of Legislative Decree no. 196 of 30 June 2003, and in particular, Article 21, paragraphs 4-ter et seq. of Decree-Law no. 75 of 22 June 2023, converted, with amendments, by Law no. 112 of 10 August 2023, as well as Ministerial Directive no. 6 of 3 April 2023, Ministerial Decree no. 192 of 10 October 2023, Ministerial Directive no. 26 of 22 November 2023, Departmental Decree no. 84 of 24 November 2023 and of Ministerial Directive no. 6 of 8 March 2024.

Personal data processed

Within the scope of the Service, users' personal data (first name, surname, tax code), contact data (e-mail address or mobile phone number) and economic-financial data (indicator on the equivalent economic situation (ISEE) of the applicant families) are processed.

Methods and purposes of processing

The Data Controllers process the personal data contained in the aforesaid Service in order to ensure the performance of institutional tasks in school matters and, in particular, in order to allow the School Institutions, assignees of the resources, to manage the requests for the disbursement of the contribution presented by the interested parties and to proceed with the assignment.

In order to use the Service, Users must log in to the Platform in accordance with the procedures set out in the specific information notice available at the [Privacy page of the website unica.istruzione.gov.it](https://www.unica.istruzione.gov.it/privacy).

Specifically, after accessing the Platform, the User proceeds with the request for recognition of the concession by selecting the first and last name of the student concerned.

The Platform uses an automated procedure to check the availability of residual resources allocated to School Institutions and query the INPS systems regarding the ISEE associated to the applicant, communicating the tax code of the student for whom the contribution is requested. For each tax code received, INPS communicates the positive or negative outcome of the request according to the ISEE threshold identified by the MIM to the Platform.

The parent therefore receives the outcome of the request (positive outcome, if the ISEE is lower than the threshold identified by the MIM; negative outcome if the ISEE is higher than the threshold identified by the MIM) in real time on the Unica platform.

The School Institutions receive the list of beneficiary pupils without a precise indication of the ISEE value associated with each pupil.

The data are processed by the Data Controllers in full compliance with the principles of correctness, lawfulness, appropriateness and relevance of processing, as well as minimisation and necessity as set out in the GDPR.

The data is processed electronically, by means of data recording, processing, storage and transmission, with the aid of computerised tools.

In any event, the Data Controller adopts technical and organisational measures provided for in the applicable legislation, which are appropriate to guarantee a level of security appropriate to the type of data processed.

Optional or compulsory provision of personal data

The provision of personal data by Users is necessary for the pursuit of the above-mentioned purposes.

Persons authorised to process data and system administrators

Persons authorised and specifically instructed by the Data Controller and the Data Processor, in accordance with Article 2-quaterdecies of Legislative Decree no. 196 of 30 June 2003, as well as system administrators identified and appointed in accordance with the Data Protection Authority Order of 27 November 2008, may access personal data for the purposes indicated above.

Recipients of data communication

Personal data will not be disclosed to third parties, except for possible requests for information by the judicial authorities and the judicial police, which are obligatory by law, and will not be disseminated.

Transfer of personal data to third countries or international organisations

The processing of personal data takes place exclusively within the European Union and the European Economic Area, except where the transfer to a third country or international organisation is strictly necessary for the proper functioning of the Service and the provision thereof.

Personal data retention period

Pursuant to Article 5(1)(e) of the GDPR, in order to ensure fair and transparent processing, Personal Data shall be kept within the Platform for a period of time not exceeding that necessary for the purposes for which it was collected or subsequently processed, in accordance with legal obligations.

In particular, in compliance with the retention limitation principle set out in the GDPR, the personal data processed in the context of this Service by the School Institutions will be kept for the period of time required for the purposes of the legal assessments and, in particular, for 5 (five) years from payment of the contribution.

Browsing data

Within the Platform, first and third party technical session cookies are used, regarding which please refer to the specific cookie policy available at [Privacy page of the website unica.istruzione.gov.it](https://www.unica.istruzione.gov.it/privacy).

Rights of Interested Parties

Interested Parties may at any time exercise their rights under Articles 15 et seq. of the GDPR, where applicable, by contacting the Data Controller as identified above. In particular, Chapter III of the aforementioned GDPR regulates the rights and methods of exercising those rights, and attributes the following to Interested Parties:

- a) right of access (Article 15 of the GDPR), i.e. to obtain in particular
 - confirmation of the existence of personal data;
 - the origin and categories of personal data, the purpose and method of their processing;
 - the logic applied in the event of processing by electronic means;
 - the identity of the Data Controller, the Data Processor and the persons or categories of persons to whom the data have been or may be communicated;

- the period of retention;
- b) right of rectification (Article 16 of the GDPR);
- c) right of cancellation (Article 17 of the GDPR);
- d) right of restriction of processing (Article 18 of the GDPR);
- e) right of data portability (Article 20 of the GDPR);
- f) right of objection (Article 21 of the GDPR);
- g) right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or significantly affects them in a similar way (Article 22 of the GDPR).

In relation to the processing of their data, the Interested Party may contact the relevant School Institution to exercise their rights.

Right of complaint

If Interested Parties consider that their personal data are being processed in breach of the GDPR, they have the right to lodge a complaint with the Guarantor pursuant to Article 77 of the aforementioned GDPR or to take legal action pursuant to Article 79 of the GDPR.

Automated decision-making process

No automated decision-making process is provided for within the meaning of Article 13(2)(f) of the GDPR.

Updates to this policy on personal data processing

This personal data processing notice may be updated in order to comply with any national and European legislation on the processing of personal data and/or to adapt to the adoption of new systems, internal procedures or for any other reason that may be appropriate and/or necessary.