



Ministry of Education and Merit

**NOTICE ON PERSONAL DATA PROCESSING**

*within the School Trips Digital Service*

*for the purpose of allocating financial contributions between School Institutions*

(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 grants to 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 (a) above.

With regard to the processing referred to in point (b) above, please refer to the specific notice issued by the School Institutions.

### **Data controller**

The Ministry of Education and Merit is the data controller (hereinafter also referred to as the "**Data Controller**") of the processing carried out for the purpose of distributing financial contributions among the School Institutions within the Service.

### **Data processor**

Sogei S.p.A. (Via Mario Carucci 99, 00143, Rome), in its capacity as the party entrusted with the infrastructure, management and application development services of the Ministry's information system, acts, pursuant to Article 28 of the GDPR, as Data Processor (hereinafter also referred to as "**Data Processor**" or "**Processor**").

### **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**

The following data are processed: (i) Users' personal data (first name, surname, tax code), (ii) contact data (e-mail address or mobile phone number), (iii) school code and (iv) economic/financial data of students and parents/guardians (indicator on the equivalent economic situation (ISEE) of families).

### **Methods and purposes of processing**

The Data Controller processes the personal data contained in the aforementioned

Service in order to proceed with (i) the identification of the School Institutions that are beneficiaries of the economic resources aimed at supporting participation in educational trips and visits, as well as (ii) the distribution of the resources among the Institutions themselves.

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).

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

Specifically, the MIM, through the authorised personnel belonging to the competent Directorate, with reference to each state upper secondary school and School Institution, transmits to the National Social Security Institute (INPS), the list of tax codes of the pupils attending the same. This transmission takes place after encrypting the mechanographic codes, which are further protected with a password communicated through a different channel (e.g. telephone).

Upon receipt of the aforementioned data from MIM, INPS, the autonomous data controller within the scope of its own competences, identifies for each student, on the basis of the Dichiarazione Sostitutiva Uniche, the relative ISEE value (indicator of the equivalent economic situation) and transmits to MIM the data, in aggregate form, relating to the number of students belonging to each ISEE band.

These data will be used by the Ministry exclusively to identify, on the basis of the resources at its disposal, the ISEE threshold below which the contribution will be granted. Depending on this threshold, the MIM then allocates resources to the institutions themselves, in proportion to the number of students with an ISEE below the aforementioned threshold.

Processing is in all cases carried out electronically by means of recording, processing, storage and transmission of data, 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. Once the retention period has expired, the Personal Data and information subject to Processing will be irreversibly deleted.

In particular, in compliance with the retention limitation principle of the GDPR, the personal data processed in the context of this Service will be kept for the period of time necessary for the purposes of resource allocation.

INPS deletes the data received from the Data Controller within 30 (thirty) days from the date of transmission to INPS.

### **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, they may exercise their rights by contacting the Ministry's Data Protection Officer at the following e-mail address address:

[rpd@istruzione.it](mailto:rpd@istruzione.it)

### **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.