



PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

Services for the inclusion and right to education of students with disabilities, Specific Learning Difficulties (SLD) and Special Educational Needs (SEN)

Information provided pursuant to Articles 13 and 14 of Regulation (EU) 2016/679

About this notice. UniCamillus processes personal data, including health-related data, only to the extent necessary to assess requests for support, identify and implement inclusion measures, and ensure equal opportunities in admission tests, attendance and examinations. Documentation is required only to implement the measures provided for by law and the University Regulations.

1. Scope of application

This privacy notice applies to the processing of personal data of candidates taking admission tests, and of students enrolled at UniCamillus who request services, support, compensatory measures or reasonable adjustments in relation to a disability, a Specific Learning Disorder (SLD) or, within the limits set out in the University Regulations, a Special Educational Need (SEN). Where the data subject is a minor or is represented by a legal representative, this notice is also provided to the latter, without prejudice to the data subject's ownership of the data and their rights.

2. Data Controller and contact details

The Data Controller is UniCamillus – Saint Camillus International University of Health Sciences, with its registered office at Via di Sant'Alessandro 8, 00131 Rome, which can be contacted on +39 06 40 06 40, by email at info@unicamillus.org and via certified email (PEC) at unicamillus@pec.it

For enquiries regarding the services covered by the Regulations, please contact the Disability and Specific Learning Difficulties Office at dso@unicamillus.org

3. Data Protection Officer (DPO)

UniCamillus has appointed a Data Protection Officer, who can always be contacted at the email address dpo@unicamillus.org

4. Categories of personal data processed

The University processes identification and contact details, data relating to applications, enrolment, student registration numbers, degree programmes and academic progression, as well as information contained in requests and communications with the Disability and Specific Learning Difficulties Office. To the extent strictly necessary, special categories of personal data may be processed (health data, certificates of disability or incapacity, SLD certificates, clinical and diagnostic documentation, and information from which a disability, SLD or other support need may be inferred).

Data is normally collected directly from the data subject via the application and documentation submitted through the institutional channels specified by the University. Where necessary, data may be provided by the person exercising parental responsibility or by the legal representative, as well as obtained from other University departments to verify identity, candidate or student status, and the academic details essential for managing the procedure. Any data originating from healthcare facilities, medical boards, professionals or other competent bodies is processed only if it is contained in the documentation provided by the data subject or obtained pursuant to a specific legal provision.

5. Purposes of processing

The data are processed for the management, at all stages, of the application (including, but not limited to: verifying that the prescribed requirements are met; assessing the documentation; providing the services; ensuring accessibility and full participation in teaching activities, work placements, where applicable, and examinations); managing communications between the relevant parties and organisations, within the limits of their respective remits; ensuring security; complying with legal obligations and requests from the competent authorities; handling any applications, complaints, disputes and activities necessary to establish, exercise or defend a right.

6. Legal bases and absence of consent

The processing of standard personal data is necessary for compliance with legal obligations and for the performance of tasks carried out in the public interest relating to university education, inclusion and the protection of the right to education, in accordance with Article 6(1)(c) and (e) and Article 6(3) of the GDPR. The processing of health-related data and other special categories of data is necessary for reasons of substantial public interest pursuant to Article 9(2)(g) of the GDPR and Articles 2-ter, 2-sexies, paragraph 2, points (aa) and (bb), and 2-septies of Legislative Decree No. 196 of 30 June 2003, in relation to the purposes of assistance, social integration and the protection of the rights of persons with disabilities, as well as higher or university education and training. Where it is necessary to process special categories of data to establish, exercise or defend a right in administrative or judicial proceedings, Article 9(2)(f) of the GDPR also applies.

7. Nature of the provision of data and consequences of failure to provide it

The provision of personal details, career information and the strictly necessary documentation is required in order to assess the request and activate the support measures; failure to provide such information may prevent or delay the assessment and implementation of the requested measures. This does not entail any further consequences for the individual's academic career, except as provided for by law or applicable regulations. The data subject is asked not to submit excessive clinical information or documents that are not relevant to the specific requirement under assessment.

8. Methods of processing

Processing is carried out using paper-based, computerised and electronic means, in accordance with the privacy principles set out in Article 5 of Regulation (EU) No 679/2016. Data may be processed, within the limits of their respective responsibilities and on the basis of documented instructions, by persons authorised in accordance with Article 29 of the GDPR and Article 2-quaterdecies of the Privacy Code. The data may be processed by providers of IT services, document management, technical support or other functional services, appointed as data processors in accordance with Article 28 of the GDPR. The data may also be disclosed to public or judicial authorities, supervisory bodies, legal representatives and advisers bound by a duty of confidentiality. Health-related data shall under no circumstances be disclosed.

9. Transfers to third countries or international organisations

The procedure governed by the Regulation does not require the transfer of personal data to countries outside the European Economic Area.

10. Retention period

Medical records and the application file are retained for the time necessary to assess the application, establish and maintain support measures and, as a rule, until the conclusion or termination of the student's university studies, unless the measure ends earlier and there are no further documented requirements. The Support Measures Operational Form, correspondence and administrative documents relating to the procedure are retained only for the period necessary to fulfil the purposes for which they were collected. In the event of disputes, complaints, investigations or legal obligations, the relevant data may be retained for the time necessary to resolve the matter. Access and security logs are retained for the periods set out in the University's IT security policies. Upon expiry, the data are erased, destroyed or anonymised.

11. Automated decision-making and profiling

The assessment of eligibility and the determination of support measures are not carried out through decisions based solely on automated processing and do not involve profiling within the meaning of Article 22 of the GDPR.

12. Rights of the data subject

The data subject may request from the Data Controller access to their personal data, the rectification of inaccurate data and the completion of incomplete data, as well as, in the cases provided for by law, erasure, restriction of processing and objection on grounds relating to their particular situation. The right to erasure and the right to object may be restricted where processing is necessary to comply with a legal obligation, to carry out a task in the public interest or to establish, exercise or defend a legal claim.

Requests may be sent to the Data Controller at the contact details provided in this notice or to the DPO at dpo@unicamillus.org

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13. Complaints and judicial redress

Should the data subject consider that the processing of personal data is in breach of the law, they may lodge a complaint with the Data Protection Authority, in accordance with the procedures set out on the website www.garanteprivacy.it, pursuant to Article 77 of the GDPR and Articles 140-bis et seq. of the Privacy Code. This is without prejudice to the right to bring an action before the courts in accordance with Article 79 of the GDPR.

14. Updates to the Privacy Policy

The updated version of this Privacy Policy is available through the University's official channels and, where changes have a significant impact on processing, data subjects are given adequate notice prior to their implementation.

Traduzione a cura del Centro Linguistico di Ateneo in data 02/09/2026.