University of Sassari

PRIVACY POLICY ON THE PROCESSING OF UNISS E-LEARNING PLATFORM USERS' PERSONAL DATA

Dear user, in its capacity as the Data Controller, the University of Sassari will acquire your personal data in compliance with the General Regulation on the Protection of Personal Data (Reg. (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016 (the so-called GDPR) and Italian Legislative Decree 196/2003 (Cod. Privacy) as amended and supplemented, a) will be treated lawfully, correctly and transparently; b) will be collected for specific, explicit and legitimate purposes; c) will be adequate, relevant and limited to what is necessary with respect to the purposes for which they are processed; d) they will be accurate and updated if necessary; e) will be kept in a form that allows the identification of the interested party for a period of time not exceeding the achievement of the purposes for which they are processed; f) will be treated in such a way as to guarantee adequate security, by means of adequate technical and organizational measures, from unauthorized or unlawful processing and from accidental loss, destruction or damage. By this document and pursuant to articles 13 and ff. of the GDPR, this is to inform you about **WHAT PERSONAL DATA WILL BE PROCESSED, WHO** will process them **and WHY**, **HOW** and for **HOW LONG**, as well as how to exercise you **RIGHTS** related to them.

1) 🏛 👤 NAME AND CONTACT DETAILS OF THE DATA CONTROLLER

The Data Controller is the University of Sassari, the legal representative of which is the Rector *pro tempore*. The contact details of the Data Controller are the following: **University of Sassari,** piazza Università, 21 - 07100 Sassari
Certified email: **protocollo@pec.uniss.it** Standard email: **rettore@uniss.it**

2) 👥 CONTACT DETAILS FOR THE DATA PROTECTION OFFICER (DPO)
The Data Protection Officer can be contacted by:
Certified email: **protocollo@pec.uniss.it** Standard email: **dpo@uniss.it**

3) 🪪 PERSONAL DATA THAT WILL BE PROCESSED, ⊕ PURPOSE, 📖 LEGAL BASIS and COMPULSORY NATURE

PERSONAL DATA and PURPOSES	LEGAL BASIS and COMPULSORY NATURE
Required personal data and contact details This is information necessary to identify the user: username, name, surname, email address. These data are provided automatically during authentication, or manually by the user if not acquired in automatic mode, through interaction with the Active Directory authentication system or are entered by the operator if an account is created directly on the platform. **Optional personal data and contact details** The fields are the following: City/Town, institution/structure/department, id-UGOV (for employees), registration number, user type (Clerical, Scholar, Student), tax code, place, and date of birth (only for the issue of some certificates of attendance). These data are provided automatically during authentication through interaction with the Active Directory authentication system or are entered by the operator if an account is created directly on the platform. Users may enter/edit the fields City, Country, institution/facility/department, a personal image and its description, phonetic name, phonetic last name, middle name, alternative name, list of interests, web page, ICQ number, Skype ID , AIM ID, Yahoo! ID, MSN id, phone, mobile and address. **Data in the form of educational material**s. This information is in the form of digital files of the most popular formats that the platform generally defines "resources" (for example MS Word docs, PDFs, Spreadsheets, Presentations, images, videos, audio files and hypertext links). **Data relating to the final thesis and/or publications**. The e-learning platform carries out an anti-plagiarism check on the documents that students must submit for the final exam of the course of study. The paper is uploaded onto the Turnitin platform and used for plagiarism checks on the required documents. The final version of the works will be kept in the Turnitin archive for future plagiarism checks. **Data for collaboration between offices**. The University's e-	*Processing is necessary for the performance of a task carried out in the public interest or in the exercise of the official authority assigned to the controller;* **(art. 6. 1e GDPR)**. Considering the aforementioned purposes of processing data, data provision is: **Compulsory** exclusively for data relating to: name, surname, email, username, and type of authentication, and their failed, partial or incorrect assignment may have, as a consequence, the impossibility of carrying out the activity. **Compulsory**, if plagiarism check is required, for the final documents. **Optional** for all other data, and failure to provide them does not affect the functioning of the service.

sharing of information between offices. In this case, this information is in the form of digital files of the most popular formats that the platform generally defines "resources" (for example MS Word docs, PDFs, Spreadsheets, Presentations, images, videos, and hypertext links).

Tracking data. This information allows the operations carried out, defined by the events system, to be associated with specific identified parties, within the platform on resources and activities. This category includes the following data: date/time of the operation, operating username, any username involved (example: operating administrator user – that registers another involved user), context event, type of component involved (folder example, statistics, logs, etc.), summary and complete event description, origin of the event (normally valued on the web) and IP address of the client browser.

Evaluation data. This evaluation information is entered by teachers or calculated by the system relating to activities such as assignments or quizzes carried out by learners

Navigation data. This information is not collected to be associated with identified interested parties, but which by its very nature could, through processing and association with data held by third parties, allow users to be identified. This data category includes the IP addresses or domain names of the computers used by users connecting to the website, the URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment.

Data from forums and chats. This information results from the exchange of information between teachers-students and students-students or between members of the university staff.

Navigation data collected by Google Analytics. The e-learning platform of the University of Sassari could be used for some areas (department/project) of Google Analytics technology. When activated, the Google Analytics system used in the platform has been configured by adopting techniques to reduce the identification power of cookies: IP anonymization (illustration of how it works technically at https://support.google.com/analytics/answer/2763052?hl=it); configuration of the service in order to prevent the association of the remaining portion of the IP address to other data held by Google. The control on the data retention period has also been implemented (https://support.google.com/analytics/answer/7667196); the provision of data is optional; it is possible not to give any data to Google Analytics by installing a special plug-in for the browser (https://tools.google.com/dlpage/gaoptout?hl=it).

Cookies. The e-platform learning of the University d the Sassari employs a technology called "cookies". The recording and management of tracks/paths are carried out in ways which make the data not identifiable, it is possible to have more information by browsing the appropriate Cookie Policy section; in order to support aggregate statistical processing on the use of services, anonymous cookies are used with registration limited to the following information: display language, country and city of origin, browser used, operating system, internet service provider, screen resolution.
The anonymized data provided may be used for statistical surveys

Intended purposes for the processing of the personal data:

a) to allow the provision of educational activities and assessment of learning through synchronous and asynchronous technologies (both blended and fully online) by the teaching and/or clerical staff (supporting teaching activities).
b) for the maintenance and monitoring of the e-learning platform, both in relation to the technical management of the service and the data system management.

c) to share papers published by registered students using the different types of resources and/or activities available on the platform. d) to obtain anonymous statistical information on the use of the service, check the correct operation of the service, carry out monitoring activities to support service safety and to identify actions aimed at improving it. e) to fulfill legal obligations or to comply with orders from public authorities. f) to verify responsibility in the event of cybercrimes against the website or its users. g) to allow asynchronous communication between interested parties using activities such as forums, system notifications, etc. h) For the sharing of information, documents and for the asynchronous communication between internal staff at the University offices. i) To participate in the UNISCO project l) For the plagiarism check of students' final papers, storage included The anonymized data provided may be used for statistical surveys.	

4) 👥 SUBJECTS AUTHORIZED TO PROCESS THE PROCESSING, RECIPIENTS AND POSSIBLE CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA

The data will be processed within the university, under the responsibility of the Data Controller, by authorized and appropriate subjects fully trained pursuant to art. 29 of the GDPR, involved in the functions necessary to carry out the specific defined purposes and who operate in the offices responsible for the management of the University's e-learning platforms, under the responsibility of the Data Controller. Your personal data will not be communicated outside the company.

The data may be processed for the purposes set by external managers who have entered into specific agreements, conventions or memoranda of understanding, contracts with the Data Controller:

- CIENCA, based in Via Magnanelli 6/3 Casalecchio di Reno (BO), for the Moodle e-learning system used by the university

- MICROSOFT, based in Viale Pasubio, 21, 20154 Milano MI, for the Azure platform that hosts Moodle used by the university

- Turnitin LLC, based at 2101 Webster St., Suite 18000 Oakland, CA 04612 US for plagiarism testing.

The updated list of external Managers can be requested to the Data Controller .

5) 🕐 DURATION OF DATA RETENTION

The data will be stored in accordance with the principles set out in art. 5 of EU Regulation 2016/679, for a period of time not exceeding to the achievement of the purposes.
With reference to the plagiarism check function, only for the documents uploaded in the final version, the data will be entered indefinitely in the Turnitin's supplier archive, to be analyzed for subsequent plagiarism assessments. At any time, the user can request the deletion of his or her work from the Turnitin archive.

6) 📥 SOURCE FROM WHICH PERSONAL DATA NOT OBTAINED FROM THE DATA SUBJECT ORIGINATE

Some of your personal data such as name, surname, email, city, username, id-UGOV, department, registration number, role are or will be obtained for the exercise of the specific purpose by:
1) "Self Studenti" Platform – Esse3 CINECA
2) University Active Directory Service
3) UNISS Registry Application
4) School of origin, for participants in the POT7 regional UNISCO project

7) 🖥️ HOW WE PROCESS PERSONAL DATA 🛡️ MEANS/PROCESSING MODE/SECURITY MEASURES

The data will be processed through IT platforms in the Microsoft Azure cloud system of the University of Sassari, local (PC) and in paper form, for which specific security measures are adopted to guarantee safety, integrity, availability and confidentiality of the data to face risks of destruction, loss, modification, access, unauthorized disclosure: through the use of authentication systems, authorization systems, protection systems (antivirus; firewall; anti-intrusion), security also logistics

Log files may be extracted (relating to the activities carried out through the service), also by cross-referencing and processing such data to identify those responsible for abuses and/or illegal activities carried out by the interested parties or by third parties.
As part of a user's interaction with the services of the e-learning in contexts including authentication, are tracked on log basic information relating to access to the single service and session information structured in accordance with the standard W3C format https://www.w3.org/TR/WD-logfile.html

8) ▼ **AUTOMATED DECISION-MAKING**

The processing **does not involve** the activation of an automated decision-making process (including profiling,)

9) 🌍 **DATA TRANSFER TO A THIRD COUNTRY**

As a rule, the transfer of data to non-EU territories or to international organizations is not an option. As described in this policy, before transferring data we will provide you with specific information and, if an adequacy decision has not been issued for the country of destination, or adequate protection guarantees are not available, you will be asked for your consent to proceed with the transfer.

With reference to the plagiarism check function of the final thesis, note that the personal data contained in the documents could be transferred to a third country.
The Turnitin External Manager provides adequate guarantees of protection having adhered to the EU-US/EU-Switzerland Shield for privacy and data protection; Turnitin's details and privacy and security policies are available at the link
https://help.turnitin.com/it/privacy-e-sicurezza.html?Highlight=gdpr%20it.

10) ℹ️ 🔍 **RIGHTS OF DATA SUBJECT**

By contacting the Data Controller or the Data Protection Officer at the addresses indicated, you, as an interested party, have the right to exercise the **right of access** to your personal data (Art. 15 of the GDPR); the right to request more information in relation to the contents of this policy (Articles 13 and 14); the **right to amend** inaccurate personal data and integration of incomplete personal data (Art.16); **the right to cancel/to oblivion** (except for those contained in documents that must be kept by the University and unless there is a legitimate overriding reason to processing) (Art.17); **the right of limitation** (Art. 18); **the right to data portability** (in the cases provided for by the law) (Art.20); **the right to object** (Art. 21)

FOR CONSENT-BASED PROCESSING, you have the **right to withdraw your consent** at any time, without prejudice to the lawfulness of the processing based on the consent given before the revocation (Article 7 c.3 GDPR) by contacting the Data Controller or the DPO.

11) ⚖️ **RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY (Article 77, GDPR)**

It may be exercised by contacting the Privacy Authority
www.garanteprivacy.it

This privacy policy may be updated.

12) 📝 **PRIVACY POLICY UPDATE**

For this reason, we recommend that you periodically check the Privacy section of the university website
www.uniss.it/privacy
to read and refer to the most recent version.