

Processing of personal data

IDEM GARR Identity Provider Privacy Policy

(Privacy Policy pursuant to Articles 13 and 14 of EU Regulation 2016/679 - henceforth GDPR)

Definitions

- Data Controller: a legal or natural person who determines the ways and means for the processing of personal data within a specific Organisation which the Users belong to.
- Data Processor: a legal or natural person who processes data on behalf of the Controller within the limits agreed with the Controller. The Data Processor carries out the Controller's instructions and accepts the Controller's controls, in particular on the effective adoption of appropriate personal data protection measures (coincides with the legal person managing the "Resource").
- Identity Provider: IT system providing the federated authentication service for the Users of a specific Organisation.
- Resources: third-party services or services provided by the Controller which the User of the federated authentication service intends to access.
- Identity Federation: A group of federated authentication service providers and resource access service providers agreeing to interoperate according to a common set of rules.
- User: natural person using the service.
- Data subject: natural person whose personal data are processed by the Data Controller and any third parties (coincides with the User).

Name of Service	Identity Provider (IdP)
Description of Service	<p>The federated authentication service allows users of the University of Sassari to access federated Resources using their institutional credentials.</p> <p>Resources can be provided through the Italian Federation of Universities and Research Institutions (IDEM), or directly.</p> <p>The Federated Authentication Service is responsible for authenticating the user and issuing an authentication token and, if required, a minimum set of personal data for accessing the Resource.</p>
Data Controller	<p>The Data Controller is the University of Sassari, whose legal representative is the <i>Rector pro tempore</i> (Prof. Gavino Mariotti), who can be contacted at the following addresses:</p> <p>University of Sassari, Piazza Università, 21 - 07100 Sassari.</p> <p>PEC registered e-mail: protocollo@pec.uniss.it E-mail: rettore@uniss.it</p>

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	<p>The University of Sassari is the Data Controller of the personal data processed by the Service.</p>
<p>Data Protection Officer (GDPR Section 4) (if applicable)</p>	<p>The university has appointed a Data Protection Officer, Mr. P. Leoni, as a natural person with information, advisory and surveillance functions regarding the application of the GDPR, as well as cooperation and contact point with the Supervisory Authority (Privacy Guarantor), whose contact details are: PEC registered e-mail: protocollo@pec.uniss.it E-mail: dpo@uniss.it</p>
<p>Jurisdiction and supervisory authorities</p>	<p>IT-IT Data Protection Authority https://www.garanteprivacy.it</p>
<p>Categories of direct and indirect personal data processed and the legal basis for processing</p>	<ol style="list-style-type: none"> 1. one or more single identifiers 2. identification credential 3. first and last name 4. e-mail address 5. role within the organisation 6. assignment to working groups 7. specific rights to resources 8. name of the organisation he/she belongs to 9. IdP service log records: user identification, date and time of use, requested resource, transmitted attributes 10. Log record of the services required for the operation of the IdP service. <p>The personal data collected are stored in Italy in accordance with the GDPR. Their processing is aimed at providing the authentication service. The legal bases for the data processing are the provision of the authentication service (fulfilment of contractual obligations) and the legitimate interest of the Data Controller.</p>
<p>Purpose of personal data processing</p>	<p>Provide the federated authentication service in order to access the Resources requested by the data subject. Verify and monitor the proper functioning of the service and ensure its security (legitimate interest). Fulfilling any legal obligations or requests by judicial authorities.</p>

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<p>Third parties to whom the data are disclosed</p>	<p>In order to provide the service correctly, the Data Controller communicates a proof of authentication and only the personal data (attributes) requested to the suppliers of the Resources to which the User intends to access, in full compliance with the principle of minimisation.</p> <p>Personal data are transmitted only when the interested party requests access to the third-party Resource.</p> <p>For purposes related to the legitimate interest of the Controller or the fulfilment of legal obligations, some log data may be processed by third parties (e.g., Judicial Authorities).</p>
<p>Exercise of data subjects' rights</p>	<p>Contact the Data Controller at the contact details above to request access to and correction or deletion of personal data or restriction of processing concerning him or her or to object to their processing, or to exercise the right to data portability (Articles 15 to 22 of the GDPR).</p>
<p>Withdrawal of the data subject's consent</p>	<p>The only data which are collected with the consent of the data subject is the preference on the display of attributes transmitted to the Resource. Preferences are collected at the time of first access to the Resource and can be changed later by starting the access procedure again.</p>
<p>Data portability</p>	<p>The data subject may request the portability of his or her data relating to the federated authentication service, including preferences on the display of attributes transmitted to Resources, which will be provided in an open format and in accordance with Article 20 of the GDPR. The data portability service is free of charge.</p>
<p>Duration of Data Retention</p>	<p>All personal data collected for the purpose of providing the federated authentication service are retained for as long as it is necessary to provide the service.</p> <p>12 months after deactivation, all personal data collected or generated by the use of the service are deleted.</p>