



University of Sassari COOKIE POLICY AND PRIVACY NOTICE

MAIN AND DEPARTMENTAL UNIVERSITY WEB PORTALS USERS

Dear user, when you visit its main and departmental web portals, 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 your **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
<p>This information is provided for all the websites of the University portals and Departments and not for other websites, other than the previous ones, which may be surfed by the user via links.</p> <p>By browsing the portals, users' personal data are collected, with the purpose of guaranteeing online services, offering a simpler and more effective browsing, allowing the University to analyze the traffic on its sites, improve the operation of the sites and services, interact with the users.</p> <p>Entering your own information on the portals and/or through authentication to the University's web services involves the possibility of processing data relating to identified or identifiable persons.</p> <p>Furthermore, the processing could also take place in case of need to fulfill legal obligations or to comply with orders from public authorities, to ascertain responsibility in the event of hypothetical computer crimes against the website or its users.</p> <p>We inform you that the University portal websites can also use:</p> <ul style="list-style-type: none"> • Some cookies to simplify navigation and use of web pages; • Cookies to improve the service provided to users, making its use more effective and/or enabling certain functions; • Cookies that are sent by different websites or web servers (so-called "by third parties"), on which some elements (such as, for example, images, maps, sounds, specific links to pages of other domains) on the page that the user is visiting may reside. <p>Therefore, the following may be processed:</p> <p>a) Navigation data: is not collected to be associated with identified interested parties, but which by its very nature could, through processing</p> 	<p>For the navigation data and the technical cookies necessary for the operation of the Website.</p> <p>- "it is necessary for the purposes of pursuing the legitimate interests of the data controller or a third party, provided that the interests or the fundamental rights and freedoms of the data subject which require the protection of personal data are not overridden, in particular where the data subject is a child". (art. 6. 1f GDPR)</p> <p>For the other data, the legal basis is the express consent of the interested party</p> <p>- "Data Subject has given consent to the processing of his or her personal data for one or more specific purposes" (art. 6. 1a GDPR)</p> <p>For this purpose, on the occasion of the first visit to a portal webpage, NO non-technical cookies are released until the user makes his/its positive choice by clicking on the "Yes, I accept" option.</p> <p>To comply with legal obligations:</p> <p>- "processing is necessary for compliance with a legal obligation to which the controller is subject"; (art. 6. 1c GDPR)</p> <p>The provision of personal data is</p> <p>a) Mandatory (for navigation data)</p> <p>b) Optional (for Google Analytics navigation data): For this purpose, on the occasion of the first visit to a portal webpage, NO cookies of this kind are released until the user makes his/its positive choice by clicking on the "Yes, I accept" option. It</p>

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.

- b) **Navigation data collected by Google Analytics:** the web portals of the University of Sassari use Google Analytics technology to generate statistics on the use of the web portal. The Google Analytics system has been set up to reduce the identifying power of users through

- IP anonymization. At this address you can consult the technical explanation of how Analytics anonymizes IP addresses

<https://support.google.com/analytics/answer/2763052?hl=it>;

- the configuration of the service in order to prevent the association of the remaining portion of the IP address with other data held by Google.

- control of the data retention period has also been implemented

(<https://support.google.com/analytics/answer/7667196>).

- c) **Cookies:** the portal uses its own and third-party technical cookies to ensure that its functions properly and to personalize the display of pages.

- d) **Data provided voluntarily by the user** The optional, explicit, and voluntary sending of personal data, including the email address, required by the web services connected to the site entails the subsequent acquisition of such data for the sole purpose of meeting users' requests and managing the web services themselves.

USE OF COOKIES AND SIMILAR TECHNOLOGIES

Definitions

Cookies are small text files (letters and/or numbers) that allow our web server to store information on the client (the browser) to be reused over the course of the same visit to the site (session cookies) or subsequently, even some days after (persistent cookies). Depending on the user's preferences, cookies are stored by the individual browsers on the specific device used (computer, tablet, smartphone).

Similar technologies, like for example web beacon, clear GIFS and all forms of local storage introduced by HTML5, can be used to gather information about users' activities and services' use.

In this document, we refer to cookies and any other similar technologies simply as "cookies".

Types of Cookies

Based on the features and use of cookies, we can outline several categories:

Technical and aggregate statistical cookies

Navigation, functionality and session cookies used for the sole purpose of ensuring the correct functioning of the site; **Analytics** cookies used to collect information, in aggregate form, on the number of users and on how they visit the site with the aim of continuously improving the functionality, organization of content, on the support of the various platforms and browsers.

Profile cookies. These are permanent cookies used (both anonymously and not) to track users' preferences and to improve their surfing experience. Profiling cookies are used in order to create tailor-made advertising messages and targeted content presumably of interest to the user. The University and departmental portals do not use proprietary (first party) or third-party profiling cookies.

is also possible not to give any data to Google Analytics by installing a browser plugin as described

(<https://tools.google.com/dlpage/gaoptout?hl=it>).

- c) **Mandatory: (for own technical cookies necessary for the functioning of the site)**

Optional: for other cookies (third-party cookies, such as Facebook, Twitter) For this purpose, on the first visit to a portal webpage, NO cookie of this type is released until the user makes his positive choice by clicking on the "Yes, I accept" option.

d) **Optional for data provided voluntarily by the user,** in the forms or forms present on the portal or in any case indicated during contacts with the University to request the sending of information material, communications or access to specific services. As a result of failure to provide it, the University may be unable to provide the service.

The Facebook, Twitter, LinkedIn social networks use information sharing plug-ins. If you access the portals after connecting with your social account or interact with the plug-ins, some personal information may be acquired by the managers of the social network platforms. These data are collected and processed independently by the managers of the social network platforms. For more information on the processing of data collected by social networks, read the privacy policies of the managers who provide these services.

Cookies used on the University and Departmental portals

Statistic

Google Analytics with anonymized IP (Google Ireland Limited)

Google Analytics is a web analytical service offered by Google Ireland Limited ("Google"). Google uses the Personal Data collected in order to track and examine the use of this Application, compiling reports and sharing them with other services developed by Google.

Google may use the Personal Data to contextualize and personalize the advertisements of its advertising network.

This Google Analytics integration makes your IP address anonymous. Anonymization works by shortening the IP address of the Users within the member states of the European Union or in other countries that are parties to the Agreement in the European Economic Area. Only in exceptional cases will the IP address be sent to Google's servers and abbreviated within the United States.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Subject adhering to the Privacy Shield.

Interaction with social media and external platforms

This type of service allows you to interact with social networks, or other external platforms, directly from the pages of this Application. The interactions and information acquired by this Application are in any case subject to the User's privacy settings for each social network.

If a service for interacting with social networks is installed, it may still collect traffic data for the pages it is installed on, even if the Users do not use the service.

Twitter's Tweet button e social widgets (Twitter, Inc.)

The Tweet button and Twitter social widgets are social networking services provided by Twitter, Inc.

Personal Data collected: Cookies and Usage Data.





Place of processing: United States – [Privacy Policy](#). Subject adhering to the Privacy Shield.

Facebook's 'Like' button, '' button, and Facebook social widgets (Facebook, Inc.)

Facebook's "Like" and "Share" buttons, and social widgets are social networking services provided on the Facebook social network, by Facebook, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Subject adhering to the Privacy Shield.

 edln's "in  " button and social widgets are social networking services provided on  edln social network, by  edln Ireland Unlimited Company.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States and Singapore – [Privacy Policy](#). Adhering to the Privacy Shield.

Displaying content from external platforms

YouTube Widget (Google Ireland Limited)

YouTube is a video content viewing service operated by Google Ireland

Limited that allows this Website to integrate such content into its pages.
Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Subject adhering to the Privacy Shield.

Google Maps view (Google Ireland Limited)

Google Maps is a geographical map visualization service operated by Google Ireland Limited that allows this Website to integrate such content into its pages.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Subject adhering to the Privacy Shield.

Google Site Search (Google Ireland Limited)

Google Site Search is a search engine embedder operated by Google Ireland Limited that allows this Website to integrate such content into its pages.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Subject adhering to the Privacy Shield.

Awesome Table viewer (Awesome Gapps Sarl)

Awesome Table allows the display of content provided by a data source (e.g., spreadsheet) in a customizable view with filters.

Personal Data collected: Cookies and Usage Data.

[Privacy Policy](#).

Spam prevention

The services in the restricted area require the entering of credentials for access. When requested, spam protection services are activated and analyze the traffic of this website, in order to filter it from parts of traffic, messages and contents recognized as SPAM.

Google RECAPTCHA (Google Ireland Limited)

Google reCAPTCHA is a SPAM protection service provided by Google Ireland Limited.

Your use of the reCAPTCHA system is subject to Google's privacy policy and terms of use.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Subject adhering to the Privacy Shield.

Duration of cookies

The cookies used by this site terminate their validity at the time of logout (for functions accessible from login) or after a user idle time set by the server. Google Analytics cookies have an expiration of 2 years.

Managing Cookies

In general, users can decide whether to accept cookies or otherwise via their browser settings. By clicking on the name of the used browser, you will find detailed information.

You can refuse consent to the use of cookies by selecting the appropriate setting on your browser: unregistered navigation on the portal websites will still be available in all its features.

Below are the links that explain how to disable cookies for the most popular browsers (for other browsers that may be used, we suggest looking for this option in the software help).

Internet Explorer: <http://windows.microsoft.com/it-IT/internet-explorer/delete-manage-cookies#ie=ie-10>

Google Chrome:

<https://support.google.com/chrome/answer/95647?hl=it>

Mozilla Firefox:

<http://support.mozilla.org/it/kb/Gestione%20dei%20cookie?redirectlocale=en-US&redirectslug=Cookies>

Opera: <http://help.opera.com/Windows/10.00/it/cookies.html>

Apple Safari: <http://www.apple.com/it/privacy/use-of-cookies/>

To disable third-party cookies

The deactivation of third-party cookies is also possible through the methods described in the relevant information and/or made available directly by the third-party company which is the controller of this processing.

To disable only Google Analytics cookies, you can use the opt-out add-on provided by Google for the main browsers. In this way, it will also be possible to use the on-line services of the websites of the Portal System.

Deleting the cookies stored on the device

Even if the authorization to use third-party cookies is revoked before this revocation some cookies may have been stored on the user's terminal. The user's browser allows their deletion in the privacy settings. The browser options contain the "Clear browsing data" option that can be used to delete cookies, website data and plug-ins.

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 adequately trained subjects pursuant to art. 29 of the GDPR, involved in the functions necessary to carry out the specific purposes indicated, such as the e-learning and multimedia production office, and which operate in the offices of the ICT Service Center, and the competent structures for satisfying the requests of the interested party.

Without express consent (pursuant to art. 6 lett. c) GDPR), the Data Controller may communicate the data to Supervisory Bodies, Judicial Authorities as well as to all other subjects to whom communication is compulsory by law for the fulfillment of specific purposes. Personal data shall not be subject to dissemination.












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, in particular:

- CINECA Consorzio Interuniversitario, via Magnanelli 6/3 - 40033 Casalecchio di Reno (BO) as the provider of the web platform used for the www.uniss.it website.

An up-to-date list of external managers can be requested to the Data Controller.

5) DURATION OF DATA RETENTION

In relation to the different purposes and the purposes for which they have been collected, the data will be kept for the time provided for by the reference legislation or for the time strictly necessary to pursue the purposes. In particular:

- Navig@ion d@a (ref. point 3a), aimed @  man@ ent of ICT services and st@istical analyses, are  d for a period of time not exceeding  achievement of  purposes.
- The d@a collected under point 3b (Analytics), aimed @ st@istical analysis and improvement of  services provided, are kept for a maximum of 26 mon.
- The d@a collected under point 3c ( s) are kept for  dur@ion of  session or until  browser is closed.

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

There are no external sources of data origin

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

The data will be processed using IT platforms in the CINECA Consortium's systems, premises (PCs) and on paper, for which specific security measures have been adopted to guarantee the security, integrity, availability and confidentiality of the data in order to deal with the risks of destruction, loss, modification, access and unauthorized disclosure: through the use of authentication systems, authorization systems, protection systems (antivirus; firewalls; anti-intrusion) and security, including logistical security.

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

Not applicable

10) RIGHTS OF THE INTERESTED PARTY

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;

 **RIGHT OF CLAIM TO A SUPERVISORY AUTHORITY (art.77 GDPR) / or RIGHT OF APPEAL TO THE JUDICIAL AUTHORITY** pursuant to art. 140-bis of Legislative Decree No. 196/2003, as amended by Legislative Decree. n. 101/2018:

Privacy Authority

www.garanteprivacy.it

INFORMATION UPDATE

This information may be updated. For this reason, we recommend that you periodically check the Privacy section of the University website www.uniss.it/privacy to always consult and refer to the most recent version.