Privacy Policy

(Privacy Policy pursuant to Articles 13 and 14 of the (EU) Regulation No. 679/2016 - from now on GDPR)

Definitions

- Controller: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;
- Processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. The Processor carries out the instructions of the Owner and accepts the supervision thereof, in particular on the effective adoption of adequate measures regarding the protection of personal data (correspond to the Legal Person who manages the "Resource");
- Identity Provider: IT system that provides the federated authentication service for Users of a specific Organization;
- Resources: third party or Controller services to 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 that agree to interoperate according to a common set of rules;
- User: natural person who uses the service;
- Data subject: natural person whose personal data are subject to processing by the Owner and any third parties (correspond to the User).

Service Name	Identity Provider (IdP Unisalento)
Service Description	The federated authentication service that allows the Users of the University of Salento to access federated Resources by using their institutional credentials. The Resources can be provided through the Italian Identity Federation of Universities and Research Institutions (IDEM) <u>https://www.idem.garr.it/en/join/idem-resources</u> or through the eduGAIN federation (<u>https://technical.edugain.org/entities</u>) or directly from the University of Salento. The federated Authentication Service is responsible for authenticating the User, issuing an authentication token and, if required, releasing a minimum set of personal data to access the Federated Resource.

Data Controller	The University of Salento is the Data Controller of the personal data managed through the Service. Name: University of Salento Email: <u>rettore@unisalento.it</u> PEC: amministrazione.centrale@cert-unile.it Address: Piazza Tancredi 7, 73100 Lecce, Italy, IT
Data Protection Officer (GDPR Section 4) (if applicable)	University of Salento
Jurisdiction and supervisory authority	IT-IT Italian Data Protection Authority https://www.garanteprivacy.it
Categories of direct and indirect personal data processed and legal basis for processing	 The IdP service authenticates the User with at least username and password. In the case of successful authentication, the IdP service releases to the Resource some of the following data: one or more unique identifiers including [eduPersonTargetedID] anonymous, persistent, non-reassignable identifier of the user (an anonymous string automatically generated by the system). Further data that can be released: [eduPersonScopedAffiliation] information on the User's affiliation within the organization he belong to (consists of a macro-profile of the user, for example Student, Member, Staff); [eduPersonPrincipalName] persistent unique identifier of the User to uniquely recognize him in a coherent manner among different services (of the form identifier@organization); [eduPersonEntitlement] URI related to the access policy for a resource as agreed with the service provider; name and surname; email address; name of the organization he belongs to. The IdP service records: Log record of the IdP Service consisting of: user identification, date and time of usage, user's IP address, requested resource, transmitted attributes, consent for the release of attributes; Log records of the services necessary for the functioning of the IdP service.

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	 the following data for some Users: localEntity (entityID of the IdP of the University of Salento); peerEntity (entityID of the service being accessed); principalName (e-mail address); localId (same as principalName); persistentId (pseudo-anonymous identifier); peerProvidedId (null); creationDate (date when User access to the service); disableationDate (null for all). Any collected personal data is stored in Italy, in accordance with the GDPR. The data processing purpose is the provisioning of the authentication service. The legal basis for data processing is the fulfillment of contractual obligations (through the provisioning of the authentication service) and the legitimate interest of the Data Controller
Purposes of personal data processing	To provide the federated authentication service in order to allow a User to access to the requested Resources. To verify and monitor the proper functioning of the service and to ensure its security (legitimate interest). To fulfil any legal obligations or requests from the judicial authorities.
Third parties to whom the data are communicated	 The Data Controller, in order to provide the service correctly, communicates to the Resources providers to which the User intends to access, proof of the authentication and the requested personal data (attributes), in full compliance with the minimization principle. Personal data is transmitted only when the Data subject requests access to a third-party Resource. For purposes related to the legitimate interest of the Controller or to the fulfilment of legal obligations, some log data may be processed by third parties (e.g. CERT, CSIRT, Judicial Authority).

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Exercise of Subjects' rights	To request access to your personal data and their correction or deletion or to object to their processing, or to exercise the right to data portability (Articles 15 to 22 of the GDPR), you can contact the Controller by using the above mentioned contact details.
Usage of the service	The service provision requires the transmission of user attributes to the provider of the requested Resource. At the first access, you can view the ist of the user attributes that will be transmitted. Image: Clear prior granting of premission for release of your information to this service.
Data portability	The Data subject can request the portability of personal data relating to the federated authentication service, including preferences regarding the transmission of the attributes to third parties. The personal data will be provided in an open format and pursuant to Art. 20 of the GDPR. The portability service is free of charge upon the termination of service.
Duration of Data Retention	Any collected personal data is kept for as long as it is necessary to provide the service itself.