

Revisioni

Versione	Data	Descrizione	Autori
1.0	3 Dicembre 2019	Prima versione basata su: - GDPR; - vecchio modello di informativa del servizio GARR IdP in the Cloud;	Marco Malavolti Davide Vagheti Giorgio Valente IDEM-CTS

Processing personal data

(Privacy Policy pursuant to Article 13 of (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 (coincides with the Legal Person who manages the "Resource")
- Identity Provider: a computer system that provides a 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;
- Interested Party: natural person whose personal data are subject to processing by the Owner and any third parties (coincides with the User);

Service Name	Identity Provider (IdP)
Service Description	The federated authentication service allows Scuola IMT Alti Studi Lucca Users to access federated Resources using their institutional credentials. Resources can be provided through the Italian Identity Federation of Universities and Research Institutions (IDEM), or directly. The federated Authentication Service is responsible for authenticating the User, issuing an authentication token and, if required, issuing a minimum set of personal data to access the Resource.
Controller	Name: Scuola IMT Alti Studi Lucca Email: dpo@imtlucca.it Indirizzo: Piazza San Ponziano, 6 55100 Lucca Scuola IMT Alti Studi Lucca is the Controller of the personal data managed through the Service.
Data Protection Officer (GDPR Section 4) (if applicable)	Dott.ssa Silvia Fusari
Jurisdiction and supervisory authority	IT-IT Italian Data Protection Authority https://www.garanteprivacy.it

<p>Categories of personal data processed and legal basis for processing</p>	<ol style="list-style-type: none"> 1. one or more unique identifiers; 2. identification credential; 3. first and last name; 4. e-mail address; 5. role in the organisation; 6. work group affiliation; 7. specific rights to resources; 8. name of the affiliated organisation; 9. IdP service log records: User identifier, date and time of use, requested Resource, submitted attributes; 10. Log records of the services necessary for the operation of the IdP service. <p>Any personal data collected is stored in Italy, in accordance with the GDPR. The purpose data processing is the provisioning of the authentication service. The legal basis for data processing is the fulfilment of contractual obligations (through the provisioning of the authentication service) and the legitimate interest of the Controller.</p>
<p>Purposes of personal data processing</p>	<p>To provide the federated authentication service in order to access the Resources requested by the User. To verify and monitor the proper functioning of the service and ensure its security (legitimate interest). To fulfil any legal obligations or requests from the judicial authorities.</p>
<p>Third parties to whom the data are communicated</p>	<p>The Controller, in order to provide the service correctly, communicates to the Resources providers to which the User intends to access proof of authentication and only the personal data (attributes) requested, in full compliance with the principle of minimization. Personal data is transmitted only when the interested party requests access to the Resource of the third party. 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. CERT, CSIRT, Judicial Authority).</p>
<p>Exercise of Interested Party's rights</p>	<p>To request access to 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), contact the Controller at the above mentioned contact details.</p>
<p>Revocation of the consent of the interested party</p>	<p>The only data collected with the consent of the interested party are preferences regarding the transmission of attributes to third parties. Preferences are collected at the time of the first access to the Resource and may be changed afterwards by starting over again the access procedure.</p>
<p>Data Portability</p>	<p>The Interested Party may request the portability of their data concerning the federated authentication service, including preferences regarding the transmission of attributes to third parties, which will be provided in open format and in accordance with Art. 20 of the GDPR. The portability service is free of charge upon termination of the service.</p>
<p>Duration of Data Storage</p>	<p>All personal data collected to provide the federated authentication service will be stored for the entire time it will be necessary to provide the service itself. After 6 months after deactivation, all personal data collected or</p>

generated by the use of the service will be deleted.