



**UNIVERSITÀ
DI SIENA**
1240

INFORMATION ON THE PROCESSING OF PERSONAL DATA APPLICABLE TO THE PROJECT "ABACUS: AVATARS FOR THE ACADEMIC WELL-BEING OF THE STUDENT COMMUNITY OF THE UNIVERSITY OF SIENA"

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter, 'Regulation'), the University of Siena, as data controller (hereinafter, 'data controller'), hereby informs you of the methods and purposes for which it will process your personal data through the service "ABACUS: Avatar for the academic well-being of the student community of the University of Siena" activated at (abacus.unisi.it), in relation to the provision of the virtual assistant to support students of the University of Siena.

The virtual assistant is a tool used by the University of Siena to manage appointments for the university's psychological counselling service and to provide information on services, contact persons, events and projects dedicated to the well-being, inclusiveness and promotion of equal opportunities for the student community. In some circumstances, the assistant also provides, for informational purposes only, basic concepts drawn from recognised studies in the field of general psychology. If you do not wish to use the assistant, you can always consult the university website and write to the psychological support service email address to book an appointment.

It is important to emphasise that the service does not perform any form of sentiment analysis or user profiling, and interactions are not analysed to draw inferences about the emotional or psychological state or personal characteristics of users. Furthermore, the Avatar does not perform any emotional, psychological, psychotherapeutic, psychoanalytical or psychiatric support functions.

I. DATA CONTROLLER

The data controller is the University of Siena, with registered office at Banchi di Sotto, no. 55, 53100, Siena, represented by the Vice-Chancellor, Prof. Roberto Di Pietra.

The contact details of the data controller are:

- E-mail: rettore@unisi.it
- PEC (certified e-mail): rettore@pec.unisipec.it

II. DATA PROTECTION OFFICER

The contact details of the Data Protection Officer at the University of Siena are:

- E-mail: rpd@unisi.it
- PEC (certified e-mail): rpd@pec.unisipec.it

The name of the Data Protection Officer can be found at:

<https://www.unisi.it/ateneo/adempimenti/privacy>



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III. CATEGORIES OF DATA PROCESSED

Browsing data

During normal operation, the IT systems and application procedures used to operate the website automatically acquire certain personal data whose transmission is implicit in the use of Internet communication protocols or in the use of third-party technologies and/or web resources (e.g. Altmetric badges).

This category of data includes, for example, the IP address of the device connected to the site, the type of browser used, the name of the Internet service provider (ISP), the date and time of the visit, the web page from which the visitor came (referral) and the exit page.

Data provided by the user

- Identification data: first name and surname;
- Technical data: IP address, date and time of visit to the website;
- Data relating to the booking of psychological counselling: type of counselling with date and time of the session; choice of professional, if any, and any preferences regarding the date and time of the University of Siena student; student's institutional email address;
- Log data of the staff responsible for the maintenance and management of the avatars of the University's psychologists;
- Log data of the university student community;
- Unstructured conversational data: The Avatar tool is conversational in nature, so it cannot be ruled out that users may enter conversational data, including special categories of personal data (Art. 9 GDPR; so-called "sensitive" data), even if not requested or expected.

Website cookies

With regard to cookies, please refer to the ***University's Cookie Policy, which can be accessed at the following link: <https://www.unisi.it/ateneo/adempimenti/privacy/cookie-policy>***

So-called 'technical' cookies are also collected, which are used solely to transmit a communication over an electronic communications network, or to the extent strictly necessary for the provider of an information society service, explicitly requested by the contractor or user to provide that service.

Technical cookies that do not require consent:

Cookies related to activities strictly necessary for the functioning of the website, the provision of the service and related to saving preferences and optimisation:

ALGHO - FrontEnd (end-customer side)	
Name	Description



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____ChatBot__	Name that uniquely identifies the chatbot user, with which conversations are created and identified in the database. It is therefore used to retrieve the user's conversation history with the assistant.
____Disclaimer_____	Unique identifier for the chatbot's privacy conditions (configurable/modifiable by the builder)
____NotchMode_____	Storing the last chatbot interface status in mode 'embedded' ("open" / "close")
____RunXpath_____	JSON storage for browser automation: when set, the assistant can perform actions on the page on behalf of the user, such as searching for something using the site's search menu. This information is saved in this cookie so that it is available even after changing pages.
____ChatBotConversationMode__	Storing the last conversation status between user and chatbot ("standard" / "live-chat")
ALGHO - backEnd (user account side)	
Nome	Fornitore
lang	Used to store the setting for the last language selected in interface
user	Used to store the JWT token for secure exchange with the server, plus other information relating to the logged-in user, such as email address and platform features to which they have access.



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All technical cookies do not require consent, so they are automatically installed when you access the website.

IV PURPOSE OF THE PROCESSING

The purposes of the processing are as follows:

a) operation of the Avatar, which performs the functions of:

- i) information on the services offered to the student community by the University of Siena and some basic concepts taken from recognised studies in the field of psychology;
- ii) booking psychological counselling appointments for students at the University of Siena.

b) management and organisation of psychological counselling appointments for students at the University of Siena;

c) ensure the security of processing and systems;

d) checking and maintaining the correct functioning of the Avatar;

e) scientific research:

The ABACUS research project, Avatars for the academic wellbeing of the student community at the University of Siena, was created in response to the increase in psychological distress and growing difficulties that characterise students' studies, such as exam anxiety, stress, depression, panic attacks, etc. The project trial has the following objectives and expected results:

- evaluation of the virtual assistant, with particular attention to both its correct technical functioning and the quality of the user experience (UX) by the students involved;
- assessment of the reliability of the avatar in conversational interactions, evaluating the consistency and relevance of the responses provided.

f) comply with legal obligations and/or comply with orders from the Authority;

g) need to ascertain, exercise or defend a right in court.

V. DATA COLLECTION AND PROCESSING TOOLS

The data controller processes your personal data when you access the service and during conversations carried out through the service. Upon login, the user's personal data is pseudonymized and, in the event of urgent or emergency requests, the University's psychological support service may trace the identity of the person who sent the message in order to intervene promptly in relation to the purposes indicated above. Personal data is processed using manual, computerised and telematic tools with logic strictly related to the purposes themselves and, in any case, in such a way as to guarantee the security and confidentiality of the data.

VI. LEGAL BASIS FOR PROCESSING

The University of Siena will process your personal data on the basis of at least one of the following



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conditions of lawfulness (or “legal bases for processing”):

- consent given by the data subject for the purpose of booking psychological counselling appointments for students of the University of Siena, requested at the time of booking.

The processing of personal data belonging to ‘special categories’ (formerly ‘sensitive data’) that may reveal ‘racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as [...] genetic data, biometric data intended to uniquely identify a natural person, data concerning a person’s health or sex life or sexual orientation’ (Article 9 of the Regulation) will be carried out on the basis of at least one of the following conditions of lawfulness:

- explicit consent of the data subject for the purpose of booking a psychological consultation as indicated in point IV of this policy.

VII. INTERNAL SUBJECTS DATA RECIPIENTS

They may access your data for the purposes indicated in point III:

- the data controller (the University of Siena), and in particular the employees and collaborators of the University who, operating under the authority of the data controller, carry out processing activities, each in relation to their own tasks and in compliance with the applicable regulations.

VIII. EXTERNAL RECIPIENTS OF THE DATA

The data collected may be shared, always for the purposes indicated in point III, in full compliance with current legislation on the protection of personal data, with public or private entities.

Information that can no longer be traced back in any way to an identified or identifiable person may be shared through external channels such as institutional websites, information materials, publications, presentations at conferences or conventions, and other communication initiatives aimed at scientific dissemination.

The data controller also communicates your data to the data processor (i.e. the natural or legal persons who process personal data on behalf of the data controller) appointed pursuant to Article 28 of the Regulation, and in particular to the company Questit. In particular, QuestIT s.r.l. (via Firenze n. 33 - 53048 Sinalunga - SI), which provides the platform for the operation of the service, will become aware of your personal data. This entity is appointed as data processor pursuant to Article 28 of EU Regulation 2016/679. Questit uses sub-processors operating within the European Union who are bound by the security and confidentiality obligations established by the Data Controller, in compliance with the applicable regulations. Neither the Data Controller, nor the Data Processor, nor the relevant sub-processors will transfer personal data outside the European Union and therefore neither to third countries nor to international organisations..

IX. RIGHTS OF THE DATA SUBJECT

We inform you that, as a data subject, you may exercise your rights under the Regulation. In particular, you may exercise:



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- a) the right to access personal data concerning you in the forms and pursuant to Article 15 of EU Regulation 2016/679;
- b) the right to rectification: the right to obtain from the data controller the rectification of inaccurate personal data without undue delay, as well as the integration of incomplete personal data, including by providing a supplementary statement, pursuant to Article 16 of EU Regulation 2016/679;
- c) the right to erasure ('right to be forgotten'): the right to obtain from the controller the erasure of personal data without undue delay in the cases specified in Article 17 of the Regulation;
- d) the right to restriction of processing: the right to obtain from the controller restriction of processing in the cases specified in Article 18 of the Regulation;
- e) the right to data portability: the right to receive personal data in a structured, commonly used and machine-readable format and to transmit those data to another controller, in the manner and under the conditions specified in Article 20 of the Regulation;
- f) the right to object to processing: the right to object at any time, on grounds relating to your particular situation, to the processing of personal data, in the cases indicated in Article 21 of the Regulation;
- g) The data subject has the right to withdraw consent at any time, without such withdrawal affecting the lawfulness of processing based on consent given prior to withdrawal.

X. HOW TO EXERCISE YOUR RIGHTS AND LODGE A COMPLAINT WITH THE DATA PROTECTION AUTHORITY

If you want to exercise the rights described above, you may contact the data controller using the contact details provided in section I of this policy. You may also contact the Data Protection Officer using the contact details provided in section II of this policy.

For the same purpose, as well as to report any violations of the rules on the processing of personal data, you can use the University of Siena's dedicated data breach service, which can be accessed at: abuse@unisi.it.

As a data subject, you also have the right to lodge a complaint with the supervisory authority pursuant to Article 77 of the Regulation (EU Reg. 2016/679). In Italy, the supervisory authority is the Garante per la protezione dei dati personali (Italian Data Protection Authority). (<https://www.garanteprivacy.it>).

XI. DATA RETENTION PERIOD

The following retention periods are envisaged, in relation to the purposes referred to in point IV:

- The data is stored by the data controller Questit for 6 months, which is the time necessary for the University psychologists to carry out their research and appointment management activities. Pseudonymised data necessary for the purposes of organising student services at the University and supporting the decisions of the University's governing bodies will be stored for a maximum of 2 years, which is the minimum time necessary to allow for processing and analysis for the purposes indicated.

XII. MANDATORY OR OPTIONAL NATURE OF DATA PROVISION



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The provision of data for the purposes referred to in point III is necessary for the functioning of the service; refusal to provide such data will prevent the Data Subject from using the Avatar. In any case, students will still be able to: i) access information on the services offered to the student community by the University of Siena and on basic concepts taken from recognised studies in the field of psychology by consulting the institutional website and reading academic texts, scientific articles and participating in courses, seminars or university training activities; ii) book psychological counselling appointments by sending an email to sostegnopsicologico.siena@unisi.it.

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