



**UNIVERSITÀ  
DI SIENA**  
1240

## **INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR THE ADMINISTRATION OF UNIVERSITY SURVEYS**

This information notice is intended for individuals interested in participating in University Surveys administered through the LimeSurvey Cloud application or Segreteria Online - Esse3.

Please read the following information notice, prepared in accordance with Article 13 of EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the "Regulation"), also known by the acronym GDPR (General Data Protection Regulation).

The University of Siena undertakes to process your data in accordance with the principles set out in Article 5 (lawfulness, fairness, transparency, adequacy, relevance, accuracy, minimisation of processing, storage limitation, etc.).

### **I. DATA CONTROLLER**

The data controller is the University of Siena, with registered office in Via Banchi di Sotto n. 55, 53100 Siena, represented by the Rector, Prof. Roberto Di Pietra.

The data controller's contact details are:

- E-mail: [rettore@unisi.it](mailto:rettore@unisi.it)
- Certified e-mail (PEC): [rettore@pec.unisipec.it](mailto:rettore@pec.unisipec.it)

### **II. DATA PROTECTION OFFICER**

The Pro Tempore Data Protection Officer of the University of Siena is listed on the University's dedicated page at the following link: <https://www.unisi.it/ateneo/adempimenti/privacy>

The contact details are:

- Email: [rpdp@unisi.it](mailto:rpdp@unisi.it)
- Certified email address (PEC): [rpdp@pec.unisipec.it](mailto:rpdp@pec.unisipec.it)

### **III. PURPOSE OF PROCESSING**

The processing of personal data has the following purposes:

- Sending invitations to complete the questionnaire via e-mail and the LimeSurvey Cloud platform;
- Collection of opinion data, via LimeSurvey Cloud or Segreteria Online - Esse3, for statistical, archiving, scientific or historical research purposes and for institutional purposes. In these cases, completing the questionnaires within the specified deadlines may be necessary in order to access services or to complete procedures such as booking exam sessions or registering for graduation sessions.

Information is collected through questionnaires managed via LimeSurvey Cloud or Segreteria Online - Esse3, ensuring that anonymisation techniques are always applied. For the same purposes, platforms other than those expressly mentioned may be used.

For mandatory questionnaires, completion within the deadlines indicated by the Data Controller is a necessary condition for using certain services or participating in specific events (e.g., booking exams or participating in a graduation session, accessing other online secretarial services).

On the other hand, for optional questionnaires, failure to complete them does not preclude access to services



or events.

The record of the answers provided does not contain any information that could identify the respondent. Identifiers are managed in a separate database, which is updated only to verify whether or not the questionnaire has been completed, without any possibility of linking the identifiers to the answers. The anonymous results of the surveys may be stored and further processed for the institutional purposes of the organisation (e.g. teaching, organisation and evaluation of the administrative apparatus of the structures, etc.) or for statistical, archiving, scientific or historical research purposes.

#### **IV. LEGAL BASIS FOR PROCESSING AND PROCESSING OF SENSITIVE DATA**

The processing of all your personal data by the University will be carried out on the basis of the following conditions of lawfulness (or “legal bases for processing”):

- a) consent given by the data subject for the purposes of processing indicated in Section III of this policy;
- b) processing required to carry out tasks in the public interest or in connection with the exercise of public authority;
- c) processing required to pursue legitimate interests related to the fulfilment of the purposes indicated in Section III of this policy.

In the case of so-called mandatory questionnaires (e.g. questionnaires which, if not completed, prevent participation in a graduation session or booking an exam session), the legal bases used are:

- a) the necessity of processing for the performance of tasks carried out in the public interest or in the exercise of official authority;
- b) the necessity of processing for the pursuit of a legitimate interest related to the fulfilment of the purposes indicated in Section III of this policy.

The provision of particular categories of personal data will be entirely optional. In any case, such data will only be processed in the following circumstances:

- a) the data subject has given his or her explicit consent to the processing of such personal data for one or more specific purposes;
- b) processing is necessary for reasons of substantial public interest on the basis of EU or Member State law, which must be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject;
- c) processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes based on EU or national law, which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

#### **V. INTERNAL DATA RECIPIENTS**

The following may access your data for the purposes indicated in Section III:

- the data controller (the University of Siena);
- employees, collaborators, and authorised data processors of the University who, operating under the authority of the data controller, carry out processing activities for the purposes set out in Section III, each in relation to their own tasks.



## VI. EXTERNAL PARTIES WITH WHOM DATA MAY BE SHARED

The University may also communicate the personal data it holds to other public administrations if they need to process it for any procedures falling within their institutional competence and for the performance of a task carried out in the public interest or in connection with the exercise of public powers, as well as to all those public entities to which, where the relevant conditions are met, communication is mandatory under EU provisions, laws or regulations.

For the purposes set forth in Section III of this policy, the University may communicate to parties outside the University, whether public or private (e.g. local or ministerial bodies, foundations, other universities, educational institutions, research centres, student associations or other non-profit associations, etc.) that have explicitly requested the administration of a questionnaire, subject to authorisation and approval of the questionnaire and its purposes by the University Survey Policy Committee (SPC).

In the event of entrusting processing to third parties for their own purposes, the University will communicate personal data (to the extent strictly necessary) to the data processors appointed pursuant to Article 28 of the EU Regulation.

## VII. TRANSFER OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

The personal data collected will not be transferred to third countries or international associations outside the European Economic Area ("EEA").

## VIII. RIGHTS OF THE DATA SUBJECT

The data subject may exercise all the rights provided for in Article 15 et seq. of the European Regulation against the University of Siena. In particular, they may request:

- access to their personal data and all other information specified in Article 15 of EU Regulation 2016/679 (GDPR);
- correction of inaccurate data and/or its integration if it is incomplete;
- deletion (the so-called "right to be forgotten") in accordance with the forms and limits set out in Article 17 of EU Regulation 2016/679 (GDPR);
- limitation of processing in the cases indicated in Article 18 of EU Regulation 2016/679 (GDPR);
- data portability in accordance with the forms and limits set out in Article 20 of EU Regulation 2016/679 (GDPR).

In accordance with the provisions of the European Regulation, data subjects also have the right:

- to object to the processing of data concerning them, except where the processing is necessary for the performance of tasks carried out in the public interest (Article 21);
- in cases where data processing is lawful only on the basis of the consent given by the data subject, the latter has the right to withdraw consent at any time. Such withdrawal does not affect the lawfulness of the processing activity carried out prior to the withdrawal.

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

The data subject may exercise the rights described above by contacting the data controller at the addresses indicated in Section I; for the same purpose, as well as to report any violations of the rules on the processing of personal data, the data subject may use the University of Siena's *data breach* service, which can be reached at: [abuse@unisi.it](mailto:abuse@unisi.it)

The data subject also has the right to lodge a complaint with the supervisory authority pursuant to Article 77 of the Regulation. In Italy, this function is exercised by the *Garante per la protezione dei dati personali* (Data Protection Authority - <https://www.garanteprivacy.it>).



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#### **X. DATA RETENTION PERIOD**

The retention period is determined according to the principle of necessity of processing. Personal data will therefore be retained for the period necessary to fulfil the purposes set out in Section III.

The personal data collected by the University of Siena is managed and stored using the LimeSurvey Cloud application or Segreteria Online - Esse3.

Personal data within the LimeSurvey Cloud application will be deleted and destroyed as soon as it is no longer necessary for the purposes mentioned above. The maximum storage period is 6 months.

Data relating to web traffic (e.g. time and duration of connection) will be deleted or anonymised when no longer necessary for the transmission of communications, unless otherwise required by law. The maximum storage period is 6 months.

Personal data may be stored and processed for other statistical or scientific purposes.

#### **XI. MANDATORY OR OPTIONAL NATURE OF DATA PROVISION**

The provision of data for the purposes indicated in Section III is optional unless otherwise specified in the IT procedure preceding the compilation of the questionnaire.

If the completion of the information notice is mandatory or if failure to complete it may have negative consequences for the persons requested to complete it, this circumstance will be reported in the IT system before the information is compiled, and, where applicable, the consequences of failure to compile it will be specified (e.g., inability to register for a degree session or book an exam session).

This privacy policy may be subject to changes and/or updates over time. It is therefore advisable to consult and refer to the most recent version, which, in the event of an update, will be published on the University portal in the "Privacy" section (<https://www.unisi.it/ateneo/adempimenti/privacy>).

*Last updated January 2026*