

INFORMATION ON THE PROCESSING OF PERSONAL DATA WHEN ADMINISTERING UNIVERSITY SURVEYS

This notice is addressed to individuals interested in participating in University Surveys administered through the LimeSurvey Cloud application.

Please read the following notice prepared pursuant to Article 13 of EU Regulations 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter "the Regulations"), also known by the acronym GDPR (General Data Protection Regulations).

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

I. THE DATA CONTROLLER

The data controller is the University of Siena with registered office in Banchi di Sotto No. 55, 53100 Siena, represented by the Rector, Prof. Roberto Di Pietra.

The data controller's contact details are:

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

II. THE DATA PROTECTION OFFICER

Siena University's data protection officer is dott.ssa Chiara Silvia Armida Angiolini.

Her contact details are:

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

III. PURPOSE OF PROCESSING

The processing of personal data is for the purpose of forwarding via LimeSurvey Cloud the e-mail invitation to complete the questionnaire for statistical, archival, scientific or historical research purposes or for the university's institutional purposes.

The LimeSurvey Cloud application and anonymization techniques are used to acquire information using the questionnaire.

The record of responses provided does not contain any information that would identify the respondent. The identifiers are maintained in a different database updated only to check whether the questionnaire has been completed, with no possibility of linking the identifiers to the responses. Survey results, which are anonymous, may be stored and further processed for institutional purposes (e.g., teaching, organization and evaluation of the administration of facilities, etc.) or for statistical, archival, scientific or historical research purposes.



IV. LEGAL BASIS FOR PROCESSING, AND PROCESSING OF SENSITIVE DATA

The University's processing of all personal data 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 linked to the fulfilment of the purposes set forth in Section III of this policy.

In the case of so-called compulsory questionnaires (e.g., questionnaires that must be completed before graduation) the legal bases are:

- a) processing required to the purpose of carrying out tasks of public interest or related to the exercise of public authority;
- b) processing required to pursue a legitimate interest pertaining to the fulfilment of the purposes set forth in Section III of this policy.

The provision of certain categories of personal data will be exclusively optional. In any case, the processing of such data will be carried out only in the following cases:

- 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 purpose pursued, respect the essence of the right to data protection, and provide for appropriate and specific measures to protect the fundamental rights and interests of the data subject;
- c) processing is necessary for archiving purposes in the public interest, scientific or historical research, or statistical purposes on the basis of EU or national law, which is proportionate to the purpose pursued, respects the essence of the right to data protection, and provides for appropriate and specific measures to protect the fundamental rights and interests of the data subject.

V. INTERNAL DATA RECIPIENTS

The following will be able to access your data for the purposes stated in Section III:

- the data controller (the University of Siena);
- the employees, collaborators, and authorized processors of the University who, acting under the authority of the data controller, carry out processing activities for the purposes of Section III, each in relation to assigned duties.

VI. EXTERNAL PARTIES WITH WHOM DATA MAY BE SHARED

The University may also communicate the personal data of which it is the holder to other public administrations if they have to process the same for any procedures of their own institutional competence and for the performance of a task of public interest or related to the exercise of public authority, as well as to all those public entities to which, in the presence of the relevant prerequisites, the 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 entities outside the University, whether public or private (e.g., local or ministerial agencies, foundations, other universities,

educational institutions, research centres, student associations or other non-profit associations, etc.) that have made an explicit request for the administration of a questionnaire upon authorization and approval of the same and its purposes by the University Survey Policy Committee (SPC).

Should the University entrust third parties with data processing for its own purposes, it shall disclose personal data (as strictly required) to the data processors appointed in accordance with Article 28 of the EU Regulation.

VII. TRANSFER OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

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

VIII. THE RIGHTS OF DATA SUBJECTS

Data subjects may exercise against the University of Siena all the rights provided for in Article 15 et seq. of the European Regulations. In particular, they may request:

- access to their personal data and all other information specified under Article 15 EU Reg. 2016/679 (GDPR);
- correction of inaccurate data and/or to supplement incomplete data;
- deletion (the so-called "right to be forgotten") according to the forms and within the limits set forth in art. 17 EU Reg. 2016/679 (GDPR);
- limitation of processing in the cases indicated under article 18 EU Reg. 2016/679 (GDPR);
- Data portability in accordance with the forms and limits provided by art. 20 EU Reg. 2016/679 (GDPR).

According to the European Regulations, data subjects also have the right:

- to object to the processing of data concerning them, unless the processing is necessary for the performance of tasks of public interest (article 21);
- in cases where data processing is lawful only by virtue of the consent given by the data subject, the data subject has the right to revoke consent at any time. Such revocation shall not affect the lawfulness of the processing activity carried out prior to the revocation.

IX. WAYS TO EXERCISE RIGHTS AND LODGE A COMPLAINT WITH THE DATA PROTECTION AUTHORITY

Data subjects may exercise the rights described above by contacting the data controller through the contact details indicated in point I; for the same purpose, as well as to report possible violations of the rules on the processing of personal data, they may use the special data breach service of the University of Siena that can be reached at: abuse@unisi.it.

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

X. DATA RETENTION PERIOD

The retention period is defined in accordance with the principle of necessity of processing. Therefore, personal data will be kept for the period necessary to fulfil the purposes stated in Section III.

The management and storage of personal data collected by the University of Siena take place within the LimeSurvey Cloud application.

Personal data within the LimeSurvey Cloud application will be deleted and destroyed as soon as they become redundant in relation to the above purposes. The maximum retention period is 6 months.

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

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

XI. MANDATORY OR OPTIONAL PROVISION OF DATA

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

If completion of the questionnaire is mandatory or if failure to complete it has possible negative consequences for those who are asked to complete it, this circumstance will be pointed out in the computer procedure prior to completion of the questionnaire, and the consequences of failure to complete it, if any, will be specified (e.g., inability to register for a graduation session).

This policy may undergo changes and/or be updated over time. You are therefore advised to consult and refer to the most recent version, which, in the case of updates, will be published under the "Privacy" section of the University portal (<https://www.unisi.it/ateneo/adempimenti/privacy>).

Last updated: 17 May 2023