POLICY ON THE PROCESSING OF PERSONAL DATA IN THE WEBSITE OF THE UNIVERSITY OF TRENTO

according to the art. 13 of the Law decree n. 196 of the 30 June 2003

Whereas

According to the article 13 of the Law decree n. 196 of the 30 June 2003 (Code about protection of personal data, hereinafter “privacy code”), the personal data provided will be used as automated tools for the web services management offered by the website of the University of Trento (hereinafter, University), within the institutional purposes of teaching, scientific research and administration. According to the legislation referred, the processing is inspired by principles of correctness, lawfulness, transparency, relevance and non surplus and by the protection of rights and privacy of the persons involved.

Following the main definitions in the field of protection of personal data.

**Personal data:** any information concerning a natural person, identified or that can be identified, even indirectly, using any other information, included a personal identification number.

**Processing:** any operation or complex of operations, even if realized without the help of electronic tools, that concern collection, recording, organization, keeping, interrogation, elaboration, modification, selection, retrieval, comparison, utilization, interconnection, block, communication, dissemination, erasure and destruction of data, whether not registered on a database.

**Data controller:** natural or legal person, the public administration or any other institution, organization or body who is empowered to take decisions on the purposes and on the procedures of processing of the personal data and the used tools, including the security profile.

**Data processor:** natural person, legal person, the public administration or any other institution, organization or body entrusted to the data processing by the data controller of the personal data.

**Person tasked with processing:** the natural person authorized to make process operations on personal data.

**Data subject:** natural person that is the subject of the personal data

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Processing data’s purposes

The University informs that personal data are processed within the University’s institutional purposes, especially for what concern the web services management offered by the University’s website within the institutional purposes of teaching, scientific research and administration.

Kind of processed data

The information systems and software procedures relied upon to operate this web site acquire personal data as part of their standard functioning; the transmission of such data is an inherent feature of Internet communication protocols.

Such information is not collected in order to relate it to identified data subjects, however it might allow user identification per se after being processed and matched with data held by third parties.

These data are only used to extract anonymous statistical information on website use as well as to check its functioning, and they will be retained for no longer than necessary to processing data. The data might be used to establish liability in case computer crimes are committed against the website.

Navigation data

This data category includes: IP addresses and/or the domain names of the computers used by any user connecting with this web site, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of such requests, the method used for submitting a given request to the server, returned file size, a numerical code relating to server response status (successfully performed, error, etc.), and other parameters related to the user’s operating system and computer environment.
Data voluntarily provided by the user

Sending of personal data, including the email address, which is done on the basis of a freely chosen, explicit, and voluntary option, requested by web services linked to the website, entails the acquisition of the same data only in order to satisfy user’s requests and manage the same web services.

Cookies

Cookies on this website don’t acquire any sensitive data, but open the possibility of storing data in order to improve the user experience of the website and to enhance web services and to develop new services linked to the website.

This website uses Google Analytics, an analysis data service provided by Google, Inc. (Google) in order to improve the using of the web services and the communication to the users, to evaluate the internationalization’s level of the users and to promote the institutional activities according to the different kinds of users. If requested by the law, Google may transfers stored data to third parties. Data are collected only for institutional purposes and they will never be sold for commercial purposes.

On the page [http://www.google.it/analytics/terms/it.html](http://www.google.it/analytics/terms/it.html), are available other and more detailed information about the service Google Analytics.

<table>
<thead>
<tr>
<th>Cookie</th>
<th>Description</th>
<th>Drupal 6</th>
<th>Drupal 7</th>
</tr>
</thead>
<tbody>
<tr>
<td>has_js ccShowCookieIcon</td>
<td>Drupal – System cookies necessary for the web operations</td>
<td>yes</td>
<td>yes</td>
</tr>
<tr>
<td>SESS*</td>
<td>Drupal – session cookies</td>
<td>yes</td>
<td>Only for logged users</td>
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<tr>
<td>Drupal.tableDrag.showWeight</td>
<td>Drupal – only for Editor users</td>
<td>No</td>
<td>Only for logged users</td>
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<tr>
<td>Drupal.toolbar.collapsed</td>
<td>Drupal – device’s</td>
<td>No</td>
<td>Only for ICTS</td>
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Versione settembre 2015
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<thead>
<tr>
<th>Cookie</th>
<th>Description</th>
<th>Drupal 6</th>
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<td>device_type</td>
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<td>DRUPAL_UID</td>
<td>Drupal – only for</td>
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<td>reporting.</td>
<td>Yes</td>
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<td>pages they’ve visited.</td>
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**Disable Cookies**

On his choice user can disables all the cookies or only Google Analysis service’s cookies. Even if all the cookies have been disable, user can use the unauthenticated navigation mode.
of the University website, with all the website’s features. If the user disables only Google Analitycs service’s cookies, he can also use all the webservices offered by the website.

User can disable all the cookies by choosing the appropriate setting on his browser. Instructions on how to disable the cookies using the most common browser are available on the following pages:

- **Internet Explorer**

- **Google Chrome**
  - [https://support.google.com/chrome/answer/95647?hl=it](https://support.google.com/chrome/answer/95647?hl=it) (IT)
  - [https://support.google.com/chrome/answer/95647?hl=en](https://support.google.com/chrome/answer/95647?hl=en) (EN)

- **Mozilla Firefox**
  - [https://support.mozilla.org/it/kb/Gestione%20dei%20cookie](https://support.mozilla.org/it/kb/Gestione%20dei%20cookie) (IT)

- **Opera**

- **Apple Safari**

To disable only Google Analitycs service’s cookies a browser’s add- in provided by Google for the most common browsers is available on the page:

- [https://tools.google.com/dlpage/gaoptout?hl=it](https://tools.google.com/dlpage/gaoptout?hl=it) (IT)
- [https://tools.google.com/dlpage/gaoptout?hl=en](https://tools.google.com/dlpage/gaoptout?hl=en) (EN) according to the instructions provided by the add- in itself.

Cookies memorized on the user’s personal computer before the withdrawal of consent can be erased using the features on the most common browser’s privacy settings through the option “Erase navigation data/ clear browsing history” or similar, according to the instruction provided by the browser itself.

**Processing Arrangements**

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Personal data is processed with automated means for no longer than is necessary to achieve the purposes for which it has been collected.

Specific security measures are implemented to prevent the data from being lost, used unlawfully and/or inappropriately, and accessed without authorization.

Nature of data transmission
Subject to the specifications made with regard to navigation data, users are free to provide the personal data requested by web service’s form of the websites. Failure to provide such data may entail the failure to be provided with the items requested.

Recording and sending his/her own personal data entail expression of consent to process data provided for the indicated purposes.

Data controller and data processor of personal data
The data controller is the University of the Studies of Trento, via Calepina 14, 38122 Trento (TN).

Data processor is the General Director, dr. Alex Pellacani.

Data subject’s rights
Data subjects are entitled at any time to exercise the rights guaranteed by the art. 7 of the privacy code against the University, that are:

- The right to obtain confirmation of the existence of personal data concerning them, whether not registered yet, and their intelligible communication;
- The right to be informed a) of the source of the personal data, b) of purposes and methods of the processing, c) methods applied in case of processing data helped by electronic tools, d) identification data of the data controller and, in case, of data processor, e) subjects or categories of subjects that may receive the communication of personal data or that may learn about them as appointed representative in the State, or as data processors or as persons tasked with processing;
- Right to obtain a) data’s updating, rectification or, if interested, integration b) erasure, anonymization, or blocking of any data processed in breach of the law, including those which retention is unnecessary according to the purposes for which data have been collected or later processed, c) the certification that the operation referred to let. a) and b) have been communicated, including his contents, to those to whom data have been
disseminated. These fulfillments will not be made if impossible, or if it entails a disproportionate use of means compared to the protected right.

- The right to object, in whole or in part, on legitimate grounds, to the processing of data.

In order to exercise the rights guaranteed by the art. 7 is possible to send a specific request to the email address dir.gen@unitn.it