Information on the processing of student personal data within the framework of the services provided through the StrIA chatbot

Regulation EU 2016/679, the "General Data Protection Regulation" (GDPR), provides that everyone has the right to the protection of personal data concerning them.

In line with the information provided to students, the University of Trento (the "Data Controller") processes the personal data of the data subjects to provide support services to students; such services include support in finding information on the students' university career that are already present in the official documents of the University and made available in different ways by the Student services office (e.g. in the Service Desk). This document integrates such information for the processing of personal data carried out where student support services are provided through the StrIA chatbot.

The StrIA chatbot, connected with the StrIA University platform, is based on Artificial Intelligence: information on the functioning of the system and the model underlying it is available in the conditions of use.

The StrIA Chatbot has been developed and launched for the sole purpose of helping students identify relevant documents within the large amount of official documents made available by the University. As also specified in the conditions of use, the chatbot cannot be used for other purposes (e.g. to submit complaints, request psychological support, etc.).

1. Data controller

The data controller is the University of Trento, via Calepina 14, 38122 Trento, email: ateneo@pec.unitn.it; ateneo@unitn.it.

2. Contact details of the data protection officer

The contact details of the data protection officer are: rpd@unitn.it.

3. Purpose of the processing and legal basis

The University of Trento processes personal data in the performance of its institutional tasks, exclusively to:

- provide the service, i.e. answering students' questions regarding University documents;

- provide a superior level of assistance, managed by University personnel, if the answers given by the chatbot are not useful to users;

- monitor the quality of the service in order to improve it both through automatic tools and human supervision. The data processed for this purpose are always pseudonymised.

In the context of these purposes, the legal basis for processing is:

- the performance of a task carried out in the public interest by the controller (Article 6 (1)(e) of the GDPR).

4. Categories of processed data

To achieve the above purposes, the Data Controller processes data, which in some cases are pseudonymised. In particular:

- personal data (name, surname, student ID), to identify the data subject who queries the chatbot;

- administrative and career data (progress status, active enrolments, programme of study, regulation of the programme of study, type of programme, department, course year, year of enrolment, student profile, etc.), which are necessary to ensure the correctness of the chatbot's answers with respect to the question posed.

The Data Controller also processes any personal data that the data subject may enter while chatting with the chatbot. In this regard, as specified in the conditions of use, users should refrain from providing personal data or data of third parties while in conversation with the chatbot, where that is not strictly necessary to obtain the answer to the question.

5. Acquisition of data

The provision of data is optional. However, failure to provide the necessary data will make it impossible to receive assistance through the chatbot.

6. Source of the data

The data are and have been collected from the data subject.

7. Data processing methods

Personal data shall be processed by IT means lawfully, fairly, in a manner that ensures appropriate security and limited to what is necessary. An Artificial Intelligence system is used in the processing. Information on the functioning of the system and the model underlying it is available in the conditions of use.

The chatbot is connected to the Esse3 and ADA University systems, which contain the personal and career data of students. This connection is necessary to identify the data subjects and provide an effective service, as it makes it possible to contextualize the answers provided by the chatbot. Without it, the answers would be generic, irrelevant and, therefore, would not help students.

The students who are not satisfied with the chatbot's answers can request to be put in contact with a staff member. This can be done by opening a ticket in the University software (ServiceNow) which includes the students' personal data (name, surname, email address), to forward the request to the staff in charge.

The data controller point out that:

- no predictive analyses or systematic evaluations relating to the user and the content of the chats are carried out,

- no automated decisions are taken that produce legal or similarly significant effects on the user.

8. Categories of recipients and transfer of data

In the provision of the service, the Data Controller uses service providers, designated as Data Processors pursuant to article 28 of the GDPR. These are, in particular:

- Microsoft Azure (AI Services, Cognitive Search)

- OpenAI/Azure OpenAI

- MongoDB Atlas

- ServiceNow

- CINECA

The personal data may be disclosed to third parties only to comply with a legal requirement and/or a court decision or for public security.

Within the scope of the above purposes, personal data may be transferred to non-EU countries (outside the EEA). In these cases, the transfer of data will be carried out within the limits and under the conditions provided for by articles 44 et seq. of the GDPR, that is, either on the basis of an adequacy decision by the European Commission pursuant to article 45 of the GDPR or on the basis of appropriate safeguards, including the signing of standard data protection clauses (SCCs) pursuant to article 46 of the GDPR or, in the absence of such safeguards and under certain conditions, on the basis of derogations for specific circumstances pursuant to article 49 of the GDPR.

9. Data retention period

The personal data processed through the chatbot will be stored for the period necessary to achieve the purposes above and, in any case, as long as required by the regulations in force and/or by University regulations on the management and storage of the documents produced by the University in the performance of its institutional activity. In particular:

- conversation texts are stored for 12 months and then deleted;

- technical, pseudonymised, logs are stored for 12 months and then deleted;

- the data provided through the ticketing system on ServiceNow are stored for the period determined by the provisions of the University on the storage of data.

Rights of the data subjects

At any time, the data subjects may exercise the following rights established by articles 15 et seq. of the GDPR with respect to the Controller:

- right to access to personal data and other information (article 15);

- right of rectification or completion of personal data;

- right of erasure of personal data, except in cases where the University is required to retain them pursuant to article 17(3);

- right to restriction of processing of personal data (article 18);

- right to data portability (article 20);

- right to object to the processing of personal data in cases where this is permitted pursuant to article 21 of the GDPR;

- right to withdraw their consent. The withdrawal of consent shall not affect the lawfulness of processing based on consent granted before the withdrawal.

Data subjects can exercise their rights through the form available at the ["Privacy and data protection"](#) page on the University website. Fill in the form and email it to the Data protection officer (see contact details above).

In case there is an infringement of the GDPR on the processing of personal data, data subjects have the right to lodge a complaint with a data protection authority or to engage in legal proceedings by virtue of article 77 of the GDPR.

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