

INFN Cloud services privacy policy

Version 1.1 (November 2022)

1 Why this information

Pursuant to EU Regulation 2016/679 (Regulation hereinafter) and Legislative Decree 30 June 2003, n. 196, as amended by Legislative Decree 101/2018, this information describes the methods of processing the personal data of users who use the data center ReCaS-Bari.

2 RECAS-BARI

ReCaS-Bari is a data center built in 2015 by the University of Bari Aldo Moro and the National Institute for Nuclear Physics. The two institutions are now jointly managing the center on the basis of an Agreement (Agreement for the management of the Bari Center of the "ReCaS" infrastructure) and through the Joint Committee and the Coordinator of ReCaS-Bari

Further information on the organizational structure of the ReCaS-Bari center can be found at the following address:

<https://www.recas-bari.it/index.php/it/recas-bari/l-assetto-organizzativo>

3 Data Controller

The data controllers are:

University of Bari A. Moro (UNIBA)

and

National Institute for Nuclear Physics (INFN)

The Management Agreement implements the Joint Controller Agreements of 21/2/2020 by INFN and UNIBA pursuant to EU Regulation 2016/679 for the management of data processed within the ReCaS-Bari data center.

In application of the agreement, the Data Controllers:

- have decided to make use of the Joint Committee and the Coordinator of the Center for all that pertains to the processing of personal data carried out through the ReCaS-Bari center,
- have identified the Coordinator of the Center as the Contact Point for interested parties pursuant to art. 26 par. 1 of the Regulation.

Interested parties can therefore contact the Coordinator of the Center for all questions concerning the processing of their personal data carried out at the ReCaS-Bari center.

Mail: coordinatore@recas-bari.it

University of Bari A. Moro (UNIBA) Bari, Piazza Umberto I, n. 1 (P.I.01086760723 | C.F.80002170720),

Mail: rettore@uniba.it

Pec rettore@pec.uniba.it

National Institute of Nuclear Physics (INFN)

via E. Fermi, 54
Frascati (Roma), cod. fisc. 84001850589
Mail: presidenza@presid.infn.it
Pec: presidenza@pec.infn.it

Data Protection Officers can be reached at the following e-mail addresses:

INFN dpo@infn.it
UNIBA rpd@uniba.it

4. Purposes of the Processing of Personal Data

Personal data are processed within the ReCaS-Bari data center in order to:

- provide scientific computing services for the needs of research activities and projects of common interest, and to support the institutional activities of INFN and UNIBA;
- provide ICT services to support scientific communities of other Universities and national and international public research bodies, on the basis of specific agreements also separately defined by the Parties, and in support of public and/or private partners of project in which INFN and UNIBA are involved, together or separately;
- maintain and strengthen the integration and collaboration of the Center with national, European and international e-infrastructures, in particular with INFN-GRID, GARR, WLCG ed EGI;
- develop and implement new technologies for high-performance scientific computing to benefit the scientific communities which UNIBA and INFN belong to;
- promote and carry out dissemination, teaching and advanced training activities in the field of high-performance computing and data analysis;
- promote and carry out technology transfer and third-party activities with public and private entities, to foster innovation at a local level, for both local public administrations and enterprises.

5. Types of processed data

The data processed at the ReCaS-Bari data center are of the types specified below.

5.1 . Data provided by the user

These are all personal data provided by the user when requesting a service from ReCaS-Bari.

Treatments are carried out on such with the specific consent provided by each user at the time of registration and service request and are essential to provide the services.

The processing of sensitive or judicial data is excluded and, if provided by the user, will be deleted.

5.2 Data relating to the video surveillance system

Access to the ReCaS-Bari data center is subject to a video surveillance system. The use of the cameras is aimed at protecting the safety of the personnel who work at the Center and of the subjects who access it, as well as at protecting the assets present therein against all possible illegal actions. The data is processed in accordance with the provisions of art. 6 par. 1, letter f of the GDPR.

The video surveillance system is in operation 24 hours a day, 7 days a week. The viewing and management of the images taken through the video surveillance system are reserved to the data controllers and/or to the persons formally appointed by them. The data are stored with the use of security measures suitable to prevent access by unauthorized personnel and to guarantee confidentiality and integrity.

5.3 Data generated during the use of ReCaS-Bari

Other data is automatically generated by the ReCaS-Bari services used by the user, such as log-in and log-out data and job submission data.

Please note that the optional, explicit and voluntary sending of e-mails to the addresses indicated on the website www.recas-bari.it, such as a support request sent to recas-support@lists.ba.infn.it, involves the acquisition of the sender's e-mail address, necessary to respond to the inquiry, as well as any other personal data included in the message.

Also in this case, treatments are carried out on the data with the specific consent provided by each user at the time of registration and service request and are essential to provide the services.

6. Treatment Methods

Treatment means all operations or set of operations concerning the collection, registration, organization, conservation, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation, and destruction of data.

Personal data are mainly processed using electronic procedures and supports and in a lawful, correct, and pertinent manner, limited to what is necessary to achieve the purposes of the processing, only for the time necessary to achieve the objectives for which they were collected and in any case in compliance with the principles indicated in art. 5 of EU Regulation 2019/679 GDPR. Specific security measures are observed to prevent data loss, illicit or incorrect use, and unauthorized access.

7. Place of Data Processing

The processing of personal data connected to the use of the services provided by ReCaS-Bari takes place at the ReCaS-Bari data center and is only handled by technical personnel in charge of the processing itself, or by the managers designated by the Data Controllers through the Coordinator, who operate within the European Union.

8. Data Retention Period

ReCaS-Bari processes the personal data collected from each interested party for the entire time for which the services of the Center are used, as well as for archiving purposes connected to the obligations to which it is held the public administration, in compliance with the provisions of EU Regulation 2016/679.

The data acquired in relation to the use of computing resources and access to network services are kept for a period not exceeding six months and can be used for security control purposes and for systems optimization by designated and competent personnel only.

If proxy servers, VPNs or other connection control systems are installed, the information collected will be kept for a period not exceeding seven days by the delegated personnel and will be examined or processed only if it is deemed necessary to guarantee the security or good functioning of the system.

The images contained in the video recordings are ordinarily stored for a maximum of 72 hours from the date of detection, except for special needs for further conservation in relation to holidays or the closure of offices and services, or if a specific investigative request of the judicial authority or of the police bodies must be adhered to. After this term, the images are automatically deleted.

9. AUTHORIZED PERSONS

The "authorized" persons are appointed by the Controllers, through the Coordinator of the ReCaS-Bari data center, among the INFN and UNIBA personnel involved in the management of the resources made available for the functioning of the Centre, in scope of their respective functions and in accordance with the instructions received, only for the achievement of the purposes indicated in this statement.

The latter are required to use personal data exclusively for the purposes indicated by the Joint Data Controllers, not to keep them beyond the indicated duration or to transmit them to third parties without the explicit authorization of the Joint Data Controllers.

10 Communication and Dissemination

The data collected will not be disclosed or communicated to third parties, except in the cases expressly provided by law and, in any case, with the methods permitted by it, such as, for example, in the event of a request from the Judicial Authority.

The data collected during user registration will also be used to verify the user's persistence in the declared organization and to check the right to use the requested services. The head of the organization declared during registration will also be periodically informed of the use of resources made by users belonging to his organization.

11. Rights Of Interested Parties

The interested parties have the right to ask the Data Controllers to access personal data and to correct or cancel them, or to limit their processing, or to oppose to the processing in accordance with the provisions of articles 15 and following of the Regulation. Relevant inquiries must be presented by contacting the Coordinator of the center at the following email address: coordinatore@recas-bari.it

The interested parties also have the right to lodge a complaint with the Guarantor as supervisory authority or to take the appropriate judicial offices (articles 77 and 79 of the Regulation).

With respect to the images relating to the video surveillance system, the right of updating or integration, as well as the right of rectification pursuant to article 16 of the GDPR, cannot be exercised in practice in consideration of the intrinsic nature of the data processed (images collected in real time

concerning an objective fact). The right to data portability referred to in Article 20 of the GDPR cannot be exercised as the images acquired with the video surveillance system cannot be transferred to other subjects.

12. UPDATES

This information is subject to updates in compliance with national and Community legislation on the subject, therefore we invite you to consult it periodically. In case of non-acceptance of the changes made to this information, the user can request the Data Controller to delete his personal data.