



UNIVERSITÀ DEGLI STUDI DI PALERMO

Privacy Policy as of Article 13 of EU Regulation 2016/679 on Data Protection (GDPR)

To the intents and purposes of Article 13 of EU Regulation 2016/679 on Data Protection, this privacy policy is provided for the interested parties with regard to the personal data, which the University of Palermo, with registered office in Piazza Marina No. 61 - 90133 Palermo, in its capacity as Data Controller and in the person of the Rector, Prof. Massimo Midiri, comes to hold for the purposes as of point 3 below.

“Processing of personal data” means any operation or set of operations, performed with or without the aid of computerised or automated processes applied to personal data or sets of personal data, even if not recorded in a database, such as the collection, recording, organisation, structuring, retention, processing, selection, block, adaptation or modification, extraction, consultation, use, communication by transmission, disclosure or any other form available, comparison or interconnection, limitation, deletion or destruction.

The processing of the personal data is imbued with the principles of correctness, lawfulness and transparency, and the protection of confidentiality and rights.

1) IDENTITY AND CONTACT DATA FOR THE DATA CONTROLLER

“The Data Controller” is the University of Palermo, with registered office in Piazza Marina No. 61, 90133 Palermo, in the person of the Rector, Prof. Massimo Midiri, its legal representative (hereinafter Controller). The Controller can be contacted by writing to the physical address shown above or by sending an email to the email address rettore@unipa.it or PEC, pec@cert.unipa.it.

2) CONTACT DATA FOR THE DATA PROTECTION OFFICER

There is a Data Protection Officer (hereinafter DPO) appointed by the Controller under Article 37 of EU Regulation 2016/679. The DPO can be contacted at the email address dpo@unipa.it or at PEC dpo@cert.unipa.it.

3) PURPOSE AND LEGAL BASIS OF THE PROCESSING

The processing of the data requested of the interested party is carried out in compliance with the principles of lawfulness, correctness, transparency, limitations on purpose and period of retention, minimisation of the data, exactness, integrity, confidentiality and making people responsible as of Articles 5 and 6 of EU Regulation 2016/679.

Your personal data will be processed solely for the following purposes:

- Normal operation of the Moodle e-learning platform
- Participation in on-line courses held by the FORTHEM Alliance
- Virtual mobility to participate in on-line course held by other universities in the FORTHEM alliance. To this end, your personal data can be transferred to other platforms, subject to explicit consent, for the creation of user accounts.
- Recognition of the activities carried out through the issue of micro-credentials, certificates and badges. It is for this purpose that the person’s personal data could be forwarded to other FORTHEM platforms.



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The legal basis for the processing is made up of the consent of the interested party and the legitimate interest of the controller with regard to the purposes of the project indicated above.

4) CATEGORIES OF PERSONAL PROCESSED

The data processed are the institutional email and full name. Moreover, the Moodle platform keeps track of the activities carried out on it.

Furthermore, the following attributes are required of the organisations to which the users belong in order to allow federated login via EduGain:

- surname (sn)
- givenName
- email

5) NATURE OF THE DATA TRANSFER

The transfer for the purposes described in Article 3 is compulsory and any refusal by the user rules out the supply of the service.

6) DATA RECIPIENTS

In all the cases illustrated above, the personal data are processed by the Controller and persons belonging to the university structures authorised by the Controller to process data in relation to their functions and remits.

The Controller may communicate your personal data externally to the following third parties, whose activities are necessary for achieving the purposes indicated in point 3 of this privacy policy:

- Private entities to which the university entrusts services in its remit under outsourcing;
- Other universities belonging to the FORTHEM alliance

Your personal data will not be disclosed.

7) POSSIBLE TRANSFER OF DATA TO THIRD PARTY COUNTRIES AND/OR INTERNATIONAL ORGANISATIONS

The transfer of data to a non-EU country or international organisations is not envisaged.

8) PERIOD OF DATA RETENTION

The personal data, processed by the Controller on the basis of your consent, will be retained for the time strictly necessary to achieve the purposes as of point 3 in this privacy policy and, in any case, they will no longer be processed following your revocation of the consent given, whenever this is allowed by law.

9) RIGHTS OF THE INTERESTED PARTY

It must be noted that, with reference to his/her personal data, the interested party can exercise the following rights under Articles 15-21 of EU Regulation 2016/679;

1. the right to access the personal data and all information;
2. the right to correct inexact personal data or supplement incomplete data;



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3. the right to delete (“right to be forgotten”, Article 17) the personal data with the exception of those contained in deeds that must be retained compulsorily by the University in accordance with the provisions of point f) or those where the legitimate interest of the University to retain them for public interest purposes prevails;
4. the right to limit the processing, i.e. the right to obtain limitations on the processing from the Data Controller, without prejudice to the provisions regarding the need and obligatory nature of the data processing so as to be able to enjoy the services offered;
5. the right to the portability of the data if in electronic format;
6. The right to object to the processing of personal data concerning him/her, including profiling.

10) EXISTENCE OF AUTOMATED DECISION-MAKING PROCESSES

The Data Controller does not use automated decision-making processes as of Article 22 of EU Regulation 2016/679, including profiling.

11) METHOD FOR EXERCISING THE RIGHTS

In order to exercise the rights shown above, the interested party can turn to the Controller at this email address, rettore@unipa.it, or at PEC, pec@cert.unipa.it.

Under Article 12, paragraph 3, of EU Regulation 2016/679, the Controller is obliged to reply within a month of receiving the request, a term that can be extended to three months if the claim is of particular complexity.