

## Information Notice on the Processing of Personal Data Pursuant to Article 13 of Regulation (EU) 2016/679 – General Data Protection Regulation (GDPR)

Pursuant to Article 13 of Regulation (EU) 2016/679, and in compliance with the principle of transparency, the following information is provided regarding the characteristics and methods by which personal data of users of the website of the University of Basilicata (<https://portale.unibas.it/site/home.html>) and Google Sites as part of Google Apps are processed.

Please note that this notice is limited to the aforementioned site(s) and does not apply to other websites that may be accessed via links contained therein.

The University of Basilicata is committed to complying with the mandatory regulations regarding transparency and any other legally required publication of data and documents.

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### 1. Data Controller, Data Protection Officer (DPO), and Data Processor

The Data Controller is the University of Basilicata, represented by the acting Rector, who has appointed, pursuant to Articles 37 and following of Regulation (EU) 2016/679 (GDPR), the Data Protection Officer.

- **Address:** Via dell'Ateneo Lucano No. 10, 85100 Potenza
- **Email:** [rpd@unibas.it](mailto:rpd@unibas.it)
- **Certified Email (PEC):** [protocollo@pec.unibas.it](mailto:protocollo@pec.unibas.it)

The Data Processor for the provision of portal services is Ariadne Srl, with its registered office at Via Visconti di Modrone 11, 20122 Milan.

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### 2. Types of Data Processed

The IT systems and application procedures used for the operation of the websites covered by this notice automatically collect the following types of data during their normal operation:

- **a) Browsing data** collected during visits to the website, which are implicitly transmitted when using internet communication protocols. These include the IP address of the connecting device, browser type (e.g., Safari, Chrome, Firefox), name of the internet service provider (ISP), date and time of visit, referring webpage (i.e., the site or domain linking to Unibas), and exit page.
- **b) Data collected through cookies** during users' browsing activities on the site. For further details, please refer to the Cookie Policy.

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### 3. Purpose of Processing

The University of Basilicata collects data for institutional activities and the following purposes:

- **a)** To allow navigation of the University's web portal (<https://portale.unibas.it/site/home.html>) and Google Sites associated with the [unibas.it](https://unibas.it) domain.
- **b)** To monitor the proper functioning of the site, ensure security, improve efficiency, and implement necessary corrections based on browsing data analysis.

- **c)** To comply with legal obligations, assist law enforcement authorities, and investigate potential cybercrimes against the website or its users.
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#### 4. Legal Basis for Processing

The legal bases for data processing, as set out in Article 6 § 1 of the GDPR, include:

- The performance of tasks in the public interest (Article 6 § 1(e) GDPR).
- Processing necessary for the prevention and suppression of fraud or other unlawful activities (Article 6 § 1(c) and (f) GDPR).
- Processing necessary for the execution of a contract to which the data subject is a party (Article 6 § 1(b) GDPR).
- The data subject's consent (Article 6 § 1 GDPR).

For processing based on consent, the data subject has the right to withdraw consent at any time without affecting the lawfulness of processing conducted before withdrawal (Article 7 § 3 GDPR).

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#### 5. Processing Methods

Personal data are processed in compliance with the principles of lawfulness, fairness, and transparency set out in Article 5 GDPR. Processing is carried out using IT and telematic tools, ensuring data security and confidentiality.

The processing performed by the CINECA Consortium, as Data Processor, is strictly limited to the purposes outlined in section 3. Adequate technical and organizational measures are implemented to protect data from unauthorized access, unlawful processing, accidental loss, destruction, or damage.

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#### 6. Use of Cookies

Cookies are text strings that websites visited by users, or third-party web servers, place on users' devices to be retrieved on subsequent visits. These can be considered "temporary markers" that, when combined with other server information, may outline user profiles and identify them.

The portal only uses **technical cookies**, specifically a single session cookie. For further details, please refer to the Cookie Policy.

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#### 7. Authorized Data Processing Subjects and Data Sharing

The University of Basilicata authorizes its employees and collaborators to process personal data in accordance with applicable regulations.

Additionally, data may be shared with:

- **Public institutions or university-affiliated consortia**, such as the Ministry of University and Research (MUR), for institutional purposes.
- **External entities** appointed as Data Processors under Article 28 GDPR (an updated list is available from the Data Controller).

- **Law enforcement authorities** and **public entities** for defense, national security, or criminal investigations.

Ariadne, as Data Processor, appoints its employees and collaborators as authorized data processors, who may handle data in the course of their duties.

Unless specifically required, personal data will not be disclosed to third parties, transferred to non-EU countries, or shared with international organizations without explicit consent and justified reasons.

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## 8. Data Retention Period

The retention period varies depending on the purpose of data collection and relevant legal requirements:

- **Browsing data:** retained for a maximum of **365 days**.
  - **Data collected through cookies:** retained according to the timeframes specified in the Cookie Policy.
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## 9. Data Subject Rights

The data subject has the right to request, where applicable:

- Access to their personal data.
- Rectification or deletion of their data.
- Restriction of processing.
- Objection to processing (Articles 15 and following of the GDPR).

Requests can be sent to the Data Protection Officer at: [rpd@unibas.it](mailto:rpd@unibas.it).

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## 10. Right to Lodge a Complaint

If a data subject believes that their data is being processed in violation of GDPR provisions, they have the right to:

- **File a complaint** with the relevant **supervisory authority**, as per Article 77 GDPR.
  - **Take legal action** as per Article 79 GDPR.
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## 11. Third-Party Services

The University of Basilicata's website implements **AccessiWay**, a service aimed at improving web accessibility. This service may process some user browsing data, including:

- IP address.
  - Browsing data related to accessibility features used (e.g., enabling readability options, text enlargement, high contrast).
  - Technical details about the user's browser and device.
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## 12. Amendments to this Notice

This Privacy Notice may be updated over time. Users are encouraged to check for the latest version by visiting the **Privacy and Data Protection** section of the University's website: <https://portale.unibas.it/site/home/riferimenti/protezione-dati.html>.