

# Privacy Statement for Identity Provider (IdP)

13/09/2022

## 1. Description of the processing operation

The eduGAIN interfederation service connects identity federations around the world, simplifying access to content, services and resources for the global research and education community. The eduGAIN consortium consists of many legal entities and is compulsory within the CIVICA project.

The federated Authentication Service is responsible for authenticating the User, issuing an authentication token and, if required, releasing a minimum set of personal data to federated service providers.

## 2. What personal information do we collect, for what purpose(s), and through which technical means?

Collected personal data related to the idem / eduGAIN federated access may contain some of the following personal data, collected by the contractor from the user:

- one or more unique identifiers (persistent identifier);
- Surname and Name;
- Email address;
- Role in the Organization;
- work group affiliation;
- specific rights to resources;
- name of the affiliated organisation.

The purposes of the processing operations are:

- Provide federated authentication service in order to access the Resources requested by the interested party.
- Verify and monitor the proper functioning of the service and ensure its security (legitimate interest).
- The Judicial Authority must fulfil legal obligations or requests.

Personal data are processed as follows:

- a) *Automated Processing*: Data is processed automatically when a user accesses federated resources through idem / eduGAIN Authentication Service.

The Institute – as Identity Provider – transfers Personal data (attributes) to third parties (Resources) upon request of the interested user, with the goal of accessing the required federated service.

The Institute authentication service is performed from Microsoft Azure Enterprise application, which collects the access log. Each time a new authentication takes place a new record is added automatically to the log file.

- b) *Manual Processing*: ICT Service staff and authorised contractors may perform manual processing in the following cases:
- Monitoring and configuring the service;
  - Troubleshooting issues concerning operational activities.

## 3. Who has access to your information and to whom is it disclosed?

Data may be processed by authorised ICT Service staff members and External Processors (*Emm&mmE Informatica S.R.L. (Italy) and MaticMind S.p.A. (Italy)*).

Access to logs may be made by judicial or law-enforcement authorities. Access requires the Secretary General's prior authorisation, after consulting the DPO and (if deemed necessary) the Data Protection Committee in compliance with Article 8 paragraph 1 of the EU's DP Policy, "Processing of data logs, e-mails and traffic data".

#### **4. How do we protect and safeguard your information?**

##### **Organisational measures**

The idem / eduGAIN log is part of the minimum-security requirements of the IDP systems to ensure the EUI users' access to idem / eduGAIN federated resources.

##### **Technical measures**

Access to MS Enterprise application log is granted only to those authorised, using their individually assigned credentials (i.e. login and password).

##### **Security controls**

In compliance with Article 11 "Security of processing" of EUI's DP Policy, the list of security controls implemented includes: accesses to MS Enterprise application log are recorded in an audit log; audit logs are recorded on the Microsoft Azure cloud service.

#### **5. How long do we keep your data?**

All personal data collected to provide the federated authentication service will be stored for the entire time it will be necessary to provide the service itself.

However, data logs are retained for 1 month, as they are part of Microsoft Azure enterprise infrastructure logs.

#### **6. How can you verify, modify or delete your information?**

If you wish to verify which personal data are stored by the responsible Data Controller, or access, correct or delete your personal data stored at the EUI, please contact the Data Controller at [DataControllerICT@eui.eu](mailto:DataControllerICT@eui.eu). You will receive a reply within 30 working days after the receipt of the request.

Remarks concerning this privacy statement can be addressed to [data\\_protection\\_officer@eui.eu](mailto:data_protection_officer@eui.eu).

#### **7. Right of recourse**

If you consider your rights under EUI President's Decision 10/2019 have been infringed as a result of the processing of your personal data by the EUI, you have the right to request a review, according to Article 27 of the aforementioned decision.

Such requests should be addressed to the Data Controller: [DataControllerICT@eui.eu](mailto:DataControllerICT@eui.eu).

They should be notified simultaneously to: [data\\_protection\\_officer@eui.eu](mailto:data_protection_officer@eui.eu).