

Privacy Notice According to Arts. 13 and 14 of GDPR (General Data Protection Regulation) 2016/679/UE

Version 1.5 of September 24th, 2024

International School for Advanced Studies – SISSA (in the following simply referred to as the “Institution”) has adopted the **Criterion** platform, available on the web at URL <https://criterium.svelto.tech> (in the following simply referred to as the “system”) as one of its platforms for (i) research self- and internal evaluation and (ii) support for national research-evaluation procedures.

This page represents the privacy notice on personal data processing, according to Articles 13 and 14 of EU Regulation 2016/679 (GDPR). This privacy notice can be modified at any moment. The updated version will be available on this site with the date of the last update. Any substantial modification to this document will be properly published on the site home page.

According to the relevant regulations, data processing will be conducted according to principles of correctness, transparency, minimization, integrity and privacy-preservation.

Sommario

- A. Data Controller
- B. Data Protection Officer (DPO)
- C. Purpose and Legal Basis
- D. Categories of Personal Data and their Sources
- E. Profiling
- F. Transfer of Data to Third Parties
- G. Data Retention
- H. Data Subject Rights

A. Data Controller

The Data Controller is the **International School for Advanced Studies - SISSA**, represented by pro-tempore Director Andrea Romanino.

B. Data Protection Officer (DPO)

The Data Protection Officer (DPO) appointed by the Institution is reachable at e-mail dpo@sisssa.it. The Data Controller can be contacted at this e-mail by data subjects to exercise their rights or enquire about their rights in terms of personal data protection, according to Art. 12 of GDPR.

C. Purpose and Legal Basis

According to current regulations, the Institution uses the system for their institutional duties in terms of self-evaluation (Art. 2, comma 1 and 4 of DL

January 27, 2012, n. 19. Art. 3, comma 5 of DM January 30, 2013, n. 47. DM n. 987 of December 12, 2016) and participation to national research-evaluation initiatives (Art. 3 of DPR February 1 2010, n. 76, as modified by Law December, 11 2016, n. 232). The legal basis comes from Art. 6, lett. e) of UE Regulation 2016/679: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Data processing is aimed at calculating indicators relative to the scientific production of single subjects and of groups of subjects within the Institution (department, research areas, scientific sectors, recruiting sectors, or other groups deemed necessary by the Institution).

Evaluation models implemented into the system are those adopted by ANVUR within national research-evaluation procedures, namely:

- a. The VQR Evaluation Model (Law December 11, 2016, n. 232) and successive evolutions, for permanent teaching staff and for subjects at Art. 5, comma 6 of the VQR 2020-2024¹ call (“ex PhD-Students”).
- b. The National Scientific Evaluation - Abilitazione Scientifica Nazionale (ASN) (Art. 16 of Law 240/2010. Decreto del Presidente della Repubblica April 4, 2016 n. 95. Decreto Ministeriale June, 7 2016 n.120), and successive evolutions, only for permanent teaching staff.

Due to the complexity of the calculations and the volume of data managed by the system, data processing is conducted by means of digital systems, in such a way to guarantee security, integrity and protection of data, by adopting appropriate technical and organizational measures to ensure and to be able to demonstrate that processing is performed in accordance with Art. 32 of UE Regulation 2016/679. Data processing related to ex PhD-students is conducted in conformity with the rules given by ANVUR for VQR 2020-2024².

The indicators relating to the scientific production of SISSA individuals are not communicated to third parties.

D. Categories of Personal Data and their Sources

The system manages the following categories of data:

1. Name and surname, institution of affiliation, role, scientific sector, recruiting sector, department of data subjects: personal data provided by the Institution.
2. E-Mail address, for users allowed to log-in into the platform: personal data provided by the Institution.
3. Fiscal code of data subjects, provided by the Institution; the system anonymizes the fiscal code by storing exclusively a cryptographic hash based on SHA-2.
4. Id of data subjects within the institutional archive of research of the Institution (IRIS).

¹ https://www.anvur.it/wp-content/uploads/2023/10/Bando-VQR-2020-2024_31ottobre.pdf

² Document on “Modalità di Conferimento dei Prodotti della Ricerca – VQR 2020-2024” https://www.anvur.it/wp-content/uploads/2024/07/Documento-modalita-di-conferimento-dei-prodotti-della-ricerca-VQR-2020-2024_09072024.pdf, Section 4.

5. Metadata about research products taken from the institutional archive of research of the Institution (IRIS).
6. Bibliometric metadata (es: number of citations received by research papers) about research products, taken from the Scopus (<http://www.scopus.com>) and WOS (<http://access.webofknowledge.com>) databases, using access credentials provided by the Institution.
7. Data provided by the data subject about her/his research products (e.g.: in procedures requiring product selections, positive and negative preferences - "likes" and "dislikes" -- and comments).
8. Indicators about data subjects, based on the evaluation models adopted within the system; for example: for the VQR model: classes of products, number of products also by class and type; for the ASN model: values of ASN indicators for bibliometric and non-bibliometric sectors, achievement of thresholds for the qualification of associate professor, full professor and recruiting-committee member; percentiles of ASN indicators with respect to subjects of the same recruiting sector.
9. Date and time of last login by the data subject.
10. Report of inconsistencies registered in product-metadata acquisition, aimed at improving the quality and accuracy of data processing.
11. Technical cookies and JSON Web Tokens (JWT), used exclusively for the purpose of application session management.
12. Log of application sessions and user operations, used exclusively for technical purposes (security and performance analysis).

In addition, only for the purpose of allowing users to log into the platform with institutional credentials through a single sign-on procedure, the following SAML metadata are fetched from the Institution Identity Provider but not stored within the platform:

13. 'eduPersonPrincipalName'
14. 'email'

Data managed by the system are in no cases transferred to third parties, with the exception of the subjects listed in the following paragraph F.

E. Profiling

The system computes indicators relative to the scientific production of data subjects, based on the classifications adopted by evaluation models listed at paragraph C, including indicators about the placement of the scientific production of data subjects with respect to the complex of subjects evaluated by the system, and the achievement of requirements for ASN qualifications.

Each data subject is authorized to access the platform in order to access her/his personal data collected by the system and the indicators computed by the system, including profiling.

In no circumstance the output produced by the system will be used to make decisions about data subjects based solely on automated processing, which produces legal effects concerning him or her or similarly significantly affects him or her.

Each data subject can decide whether or not to make available to selected users designated by the Institution the indicators computed by the system in

order to perform the tasks required of the institution. Data subjects are allowed to change their choice at any moment.

F. Transfer of Data to Third Parties

For technical and operational reasons, the storage and processing of data listed at paragraph D can be entrusted to external service providers, like Cloud Service Providers - CSP, based in Europe, and possessing the necessary certifications in terms of privacy and security: ISO 27001/2, ISO27018/17 and SOC 2. These are data processors, according to Art. 28 of GDPR.

G. Data Retention

The data retention period for data at paragraph D is limited to one year.

After this period data are deleted from the platform.

H. Data Subject Rights

Using the contact listed at paragraph B, data subjects can, at any moment:

1. Access the system and consult their personal data and derived indicators.
2. Correct wrong data or integrate missing ones.
3. Lodge a complaint with the competent supervisory authority (Garante Privacy, <http://www.garanteprivacy.it>) according to Art. 77 of UE Regulation 2016/679 and before the competent courts according to Art.140-bis of D.lgs n. 196/2003, as modified by D.lgs. n. 101/2018.