

INFN Cloud services privacy policy

Version 1.0 (June 2022)

Why of 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 INFN_Cloud services.

INFN-Cloud

The INFN Cloud infrastructure is based on a core backbone that connects the large data centers of CNAF and Bari, and on various federated sites that connect to the backbone. The services on the INFN cloud backbone are typically reserved for specific tasks (such as the automated replication of multisite data), while the other INFN sites that are part of the INFN Cloud infrastructure can transparently execute one or more of its services, with flexible policies of orchestration. The adhesion of a site to the INFN Cloud infrastructure is governed by its Rules of participation and must be approved by the INFN Cloud Project Management Board. In case of specific agreements, INFN's Cloud infrastructure can be transparently extended to other public or private Cloud providers to increase its capacity or solutions.

Data Controller

Istituto Nazionale di Fisica Nucleare (INFN)
Via E. Fermi n. 40, Frascati (Roma)
email: presidenza@presid.infn.it
PEC: amm.ne.centrale@pec.infn.it

Data protection Officer

The Data Protection Officer can be reached at the email address: dpo@infn.it

The processing of personal data for the use of INFN Cloud services

INFN makes available an infrastructure and a series of services in Cloud mode, called INFN Cloud, **for scientific research purposes or for institutional purposes of INFN and other federation participants**. The use of INFN Cloud is open to employees and associates of INFN, or to those who have access to it by virtue of a project, contract or agreement with INFN after reading, understanding and explicit acceptance of the terms and conditions, indicated in this document, and which have been explicitly authorized by the INFN.

Access to INFN Cloud services is subject to registration and authentication, as well as acceptance of the Terms of Use and AUP¹

The services offered by INFN Cloud to which this information applies are:

- **Dashboard:** Web Portal for instantiating services on the INFN Cloud infrastructure
- **IAM:** INFN Cloud Identity and Access Management Service. It is a service used to manage the identities and authorization policies related to INFN Cloud users.
- **Notebook as a Service:** INFN Cloud on-demand service for interactive notebooks
- **Minio:** INFN Cloud Object Storage Service
- **Harbor:** INFN Cloud Trusted images registry
- **Orchestrator:** This service manages the deployment of user instances on INFN Cloud resources.

By treatment we mean all operations concerning the collection, registration, organization, conservation, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data.

INFN Cloud collects information to improve or develop services and to generate technical insights and to ensure support.

The data processed for the purpose of using the services described by the Institute are of the types specified below.

Types of data processed

¹ <https://www.cloud.infn.it/policies-procedures/>

Data communicated by the user

All those personal data provided by the user when accessing the services are:

- Web page visualized,
- settings within the service,
- browser and IP address,
- OS, device type and version information,
- crash logs,
- Information concerning the ID and password,
- Name and Surname,
- Email

The treatments put in place for these purposes are carried out with the specific consent provided by the user. Specific information may be published for the provision of certain activities. The data requested are the identifying data and aimed at registering and using the services provided by INFN Cloud.

The optional, explicit and voluntary sending of e-mails to the addresses indicated on this site entails the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message.

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

Tracking data

As part of the service activities carried out by the INFN staff in charge of monitoring and managing user support interventions, or to carry out periodic security scans, the data relating to the access logs to the services may be processed (including ssh login data).

Communication and dissemination

The data may be communicated by the Data Controller in carrying out its activities and to provide its services, to:

- **Public administrations;**
- **Providers of technical services, hosting provider and cloud service provider;**
- **Judicial authority.**

The data collected will not be disseminated or communicated to third parties without prejudice to the cases provided for in the information and by law and, in any case, in the manner permitted by them. The data may be disclosed to the staff of the Institute, within the scope of their respective functions and in accordance with the instructions received, only for the achievement of the purposes indicated in this statement.

The recipients are appointed, if necessary, as Data Processors by the Owner, who may be asked for the updated list of Data Processors. The latter, according to the stipulated contract, are required to use personal data exclusively for the purposes indicated by the Data Controller, not to store them beyond the indicated duration or to transmit them to third parties without his explicit authorization.

The personal data provided by users who submit requests for information and suggestions are used for the sole purpose of carrying out the service or provision requested and are eventually communicated to other areas within the Institute or to other public or private subjects only in the case of which is necessary to complete the request. The data are not transferred to non-EU countries.

Place of data processing

The processing of personal data connected to the INFN Cloud services referred to above takes place at the INFN facilities and is only handled by technical staff of the office in charge of processing, or by the managers designated by the owner who operate within the European Union. The User's Personal Data may be transferred to a country other than that in which the User is located. The User can check if one of the transfers described above takes place

by examining the section of this document relating to the details on the processing of Personal Data or request information from the Data Controller by contacting him at the opening contact details.

Details on the processing of personal data

The personal data collected may be disclosed to an entity that performs ancillary services to the provision of the services offered by INFN Cloud.

Processing methods

The processing of personal data is carried out mainly using electronic procedures and media and in a lawful, correct, relevant way, limited to what is needed to achieve the purposes of the processing, only for the time necessary to achieve the purposes for which they were collected and in any case in compliance with the principles indicated in art. 5 of the EU Regulation 2019/679 GDPR.

Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access.

Duration of treatment

INFN processes the personal data collected for the time necessary to allow the use of the requested service and in any case no later than 12 months from the cessation of use of the same.

Rights of the interested party

Interested parties have the right to ask the data controller for access to personal data and the correction or cancellation of the same or the limitation of the processing that concerns them or to oppose the processing in accordance with the provisions of Articles 15 and following of the Regulations. The appropriate application must be submitted by contacting the Data Protection Officer at the address indicated above. The interested parties also have the right to lodge a complaint with the Guarantor (<https://garanteprivacy.it>) as the supervisory authority or to take the appropriate judicial offices (articles 77 and 79 of the Regulation).

Update

This information is subject to updates in compliance with the relevant national and community legislation. In case of non-acceptance of the changes made to this information within 15 days of publication, the user will no longer be able to use the INFN Cloud services.