

INFORMATION ON THE PROCESSING OF PERSONAL DATA

"Mobile Device Management - MDM"

This is to inform you, pursuant to EU Regulation 2016/679 on the "Protection of natural persons with regard to the processing of personal data and on the free movement of such data" (hereinafter "Regulation") and Legislative Decree 196/2003 as amended and supplemented (hereinafter "Privacy Code"), about the processing of your personal data carried out by Fondazione Istituto Italiano Tecnologia (hereinafter "IIT"), through the the Mobile Device Management (hereinafter "MDM") managed by the Information&Communication Technology Direction (hereinafter "ICT").

1. Identity and contact details of the Data Controller

The Data Controller of your personal data is the Fondazione Istituto Italiano di Tecnologia, based in Via Morego, 30 – 16163 Genova. – Phone +39 010 28961.

2. Contact details of the Data Protection Officer

The Data Protection Officer is available at the following e-mail address: dpo@iit.it.

3. Object of data processing and types of personal data processed

The MDM is a tool for the census of IIT mobile devices in use by staff (limited to Android, IOS, Windows, Mac operating systems) to define of correct behaviors by users (for example, connect to a VPN only from verified PCs) and to set up security measures on the devices.

The MDM will only process the data strictly necessary to work in a proper manner, listed below:

- User information: Owner's name/username, user's account name or e-mail address, phone number.
- Hardware information of the registered device: IP address, MacAddress.
- Contact information: e-mail communications with team members.
- System Administrator Information: Administrator's first and last name, Administrator's username, UPN (e-mail), phone number.
- Application inventory: App name, installation path (Application inventory data is only collected when the administrator marks it as IIT device or when the feature for compliant apps is enabled).

4. Purpose and lawfulness of data processing

The purpose of the MDM is to enhance the security of IIT mobile devices (notebooks and smartphones) and prevent / mitigate potential data breach resulting from loss and / or theft of the aforementioned devices. The legal basis of the processing of personal data is the legitimate interest of IIT (art. 6.1, lett. f) of the Regulation: the "processing is necessary for the purposes of the legitimate interests pursued by the

controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data ...").

In this regard, we inform You that, as required by the Regulation, IIT has conducted a balancing test before the start of the processing, to determine if it was possible to use the legitimate interest as a legal basis. The aforementioned balancing test had had a positive result, pointing out that the processing of personal data does not infringe Your rights.

5. Processing Method

Your data will be processed in manual mode during the registration of the IIT mobile devices by authorized System Administrators.

Following the first registration, data will be collected automatically by the MDM directly from IIT mobile devices, and will be stored on the Office365 Cloud platform for their all lifecycle (collection, registration, processing, and erasure).

6. Access to personal data

Your personal data will be processed only by a limited number of ICT staff, appointed as System Administrator in compliance with the Data Protection Authority Provision: "Misure e accorgimenti prescritti ai titolari dei trattamenti effettuati con strumenti elettronici relativamente alle attribuzioni delle funzioni di amministratore di sistema" del 27 novembre 2008 e ss.mm.ii" and with the procedure "IO LO 11 System Administrators and Super Users", currently in force in IIT. Access to the data will be limited to maintenance of the MDM and to the management of specific cases, such as events of theft or loss of devices, in order to carry out remote blocking operations of the devices.

7. Categories of recipients of personal data

Your personal data may be communicated to IIT external Data Processors. In particular, for the maintenance and management of the MDM, IIT has appointed Microsoft as external Data Processor, pursuant to Article 28 of the Regulation.

8. Extra EU data transfer

The Data Centres in which the data are stored are physically located in the European Union.

In any case, considering that it is not possible to exclude the transfer of the data outside the European Union for maintenance and management activities of the MDM, Microsoft integrated the appointment as External Data Processor (Data Processing Agreement) with the Standard Contractual Clauses for the transfer of data to a third country (ref. European Commission Decision No. 914/2021). In addition, IIT formalized a Data Transfer Impact Assessment, to underline that the risk associated with the transfer of

data is low, in consideration of the technical and organisational security measures implemented by Microsoft.

9. Data retention and erasure

Data are stored for a maximum of 30 days after disabling/erasure of the IIT device, except for System Administrator logs, which are stored for a maximum of 1 year after the disabling of the account.

There are two modes of data erasure, described below:

- passive mode: an automatic operation following the end of the subscription (or registration) of IIT mobile device (e.g. in case of decommissioning of the device or removal of the user from Azure). As described above, with the exception of System Administrator logs, data are stored for a maximum of 30 days after disabling/erasure of the IIT device.
- Active mode: manual operation by a System Administrator, e.g. as a consequence of a loss or theft, or the exercise of rights by the data subject. In this case, the data are erased at the same time as the specific event.

10. Rights of the Data Subject

You may exercise the rights provided in Articles 15 and seq. of the Regulation at any time sending an e-mail at IIT Data Protection Officer. In particular, you may request:

- access to your personal data, as provided in Article 15 of the Regulation;
- rectification of your personal data, as provided in Article 16 of the Regulation;
- erasure of your personal data ("right to be forgotten"), as provided in Article 17 of the Regulation;
- restriction of personal data processing, as provided in Article 18 of the Regulation.

Finally, we remind you that you may object to the processing of your personal data at any time, pursuant to Article 21 of the Regulation, on grounds relating to your particular situation.

11. Complaint with the Supervisory Authority

Finally, pursuant to Article 77 of the Regulation, we remind You that You have the right to lodge a complaint with a Supervisory Authority, if you believe that your data processing infringes the provisions of the Regulation and the Decree.

12. Nature of the processing and mandatory nature of providing data

As specified in paragraph 3 of this information, the data are necessary for the proper working of the MDM. Their provision is, therefore, mandatory in order to pursue the purposes indicated by IIT in paragraph 4 of this information.

13. Existence of automated decision-making processes

There is NO type of automated decision-making process for the data processing, pursuant to Article 22 of GDPR.