



ALMA MATER STUDIORUM  
UNIVERSITÀ DI BOLOGNA

DIPARTIMENTO  
DI FILOLOGIA CLASSICA  
E ITALIANISTICA

## **Information on the processing of personal data pursuant to art. 13 of Regulation (EU) 2016/679**

You are invited to participate in a study that aims to evaluate the usability and user experience of the HERITRACE system carried out in the Department of Classical Philology and Italian Studies (FICLIT), University of Bologna.

Pursuant to art. 13 of Regulation (EU) 2016/679 (General Data Protection Regulation), please note that Alma Mater Studiorum - University of Bologna is the Data Controller and will process your personal data in compliance with the requirements of Regulation (EU) 2016/679 (General Data Protection Regulation) and Decree 196 dated 30 June 2003 as amended (Data Protection Code).

### **PARTIES INVOLVED IN PROCESSING**

#### **Data Controller**

Alma Mater Studiorum - University of Bologna (registered office: via Zamboni 33, 40126 Bologna, Italy; e-mail: [privacy@unibo.it](mailto:privacy@unibo.it); PEC: [scriviunibo@pec.unibo.it](mailto:scriviunibo@pec.unibo.it)).

#### **Data Protection Officer of Alma Mater Studiorum - University of Bologna**

Registered office: via Zamboni 33, 40126 - Bologna, Italy; e-mail: [dpo@unibo.it](mailto:dpo@unibo.it); PEC: [scriviunibo@pec.unibo.it](mailto:scriviunibo@pec.unibo.it).

### **PURPOSES AND METHODS OF PROCESSING**

Your personal data and, in particular, the data relating to audio recordings of your voice and comments during the user testing session, will be processed by specifically authorised persons, both with and without the use of automated equipment, for the following purposes:

#### **(A) PARTICIPATION IN THE RESEARCH AND RELATED OPERATIONS AND ACTIVITIES**

If you give your consent to participate in the study in question, some of your personal data will be collected through:

- user testing session that will be audio recorded.

Information you will provide will be processed by the principal investigator and authorized research personnel, which will replace any identification data with a code. Please note that your data will be subject to anonymisation only after a maximum period of 6 months from data collection, since, over this period of time, it may be necessary to contact you again in order to clarify some aspects of the research or ask for additional information related to the user testing session.

The data will be collected without directly identifying data (example: name, surname, etc.); however, in particular circumstances, the audio recording of your voice could lead to the possibility



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of indirectly identifying you as the participant. It should be noted, however, that for no reason the data will be processed by authorized personnel (e.g.: principal investigator and other researchers) with the aim of proceeding to the mere identification of the participant.

Personal data could be communicated to third parties who, in their capacity as Data Processors pursuant to art. 28 of Regulation (EU) 2016/679, assist the data controller in managing its information systems and services.

The processing will have as object audio recordings of your voice during the user testing session. The processing of these recordings will take place in compliance with the provisions of the law, guaranteeing anonymity through transcription and subsequent deletion of the original audio files. We would like to point out that, for the processing of audio recordings, you are required to express a specific consent, considering that voice recordings are considered personal data under GDPR.

The data collected and stored for the realization of the study in question, will be kept for a maximum period of 6 months before anonymization, after which the original recordings will be permanently deleted.

It should be noted that the data will be used solely for research analysis purposes and will not be disseminated or published externally. The anonymized transcriptions will be used exclusively for internal research evaluation and improvement of the HERITRACE system.

## **CONSERVATION FOR ADMINISTRATIVE PURPOSES**

Your data will also be processed for administrative accounting purposes and kept for the time strictly necessary for the pursuit of these purposes, except for the ten-year period to ensure the fiscal, accounting and administrative requirements required by law and, possibly, longer terms, not determinable a priori, as a consequence of different conditions of lawfulness of the treatment (for example, legal actions that make the treatment necessary for over ten years).

## **LEGAL BASIS AND NATURE OF THE PROVISION OF DATA**

The legal basis of the treatments referred to in point (A) described above lies in the consent, pursuant to art. 6, first paragraph, lett. a) of the Regulation (EU) 2016/679 (General Regulation on Data Protection) and, in the case of audio recordings which may be considered special categories of personal data, of art. 9, second paragraph, lett. a) of Regulation (EU) 2016/679. The consent to the processing for the purposes described above is optional.

However, it is specified that the provision of data for the purposes referred to in point (A) is not mandatory but is essential for the achievement of the purposes described. The refusal to grant them will not allow you to participate in the study in question.

The provision of data for administrative and accounting purposes is necessary to comply with legal obligations regarding the conservation of administrative and accounting documents. In this case the legal basis can be found in the art. 6, paragraph 1, lett. c) and e), of Regulation (EU) 2016/679.



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## RIGHTS OF THE DATA SUBJECT

Without prejudice to the limitations placed on exercise of the rights of data subjects by arts. 2undecies and 2-duodecies of the Data Protection Code (Decree 196/03), you, as a participant in this study and therefore a data subject, may exercise the rights granted pursuant and consequent to arts. 15-21 of the Regulation, including the right to request access to your personal data and its rectification or erasure, as well as to restrict the processing of your data, object to its processing and request its portability.

Please note that any consent given by you is given freely and may be revoked at any time, without any penalties or adverse effects, and without prejudicing the lawfulness of processing based on the consent given prior to revocation. These rights can be exercised only before the data anonymization process (within 6 months from data collection). Once data has been anonymized, it is no longer considered personal data under the GDPR, and these rights no longer apply.

Requests to exercise the above rights may be presented to Alma Mater Studiorum - University of Bologna by contacting Arcangelo Massari, at the e-mail [arcangelo.massari@unibo.it](mailto:arcangelo.massari@unibo.it).

Lastly, should you believe that the processing of your personal data is in infringement of the provisions of Regulation (EU) 2016/679 or Decree 196/03 and subsequent amendments and additions, you have the right to lodge a complaint with the Italian data protection authority (known as the “Garante per la protezione dei dati personali”), pursuant to Article 77 of the Regulation (UE) 2016/679, or to refer to the appropriate courts (art. 79 of the Regulation).

## Consent for the processing of personal data

I, the undersigned \_\_\_\_\_ born on \_\_\_\_\_  
in \_\_\_\_\_

pursuant to the provisions of Regulation (EU) 2016/679 and Decree 196/2003 and subsequent amendments and additions and having read the above “Information on the processing of personal data”.

☐ **give consent** ☐ **deny consent**

for the processing - NECESSARY for the purpose of participating in the user testing study - of my personal data (including audio recordings of my voice) for scientific research purposes in the manner and for the reasons described in the section entitled “Purposes and methods of processing” (point A), also pursuant to art. 96 of the copyright law and considering that voice recordings constitute personal data under GDPR.

**Date:** \_\_\_\_\_

**Signature:** \_\_\_\_\_