



SCUOLA  
NORMALE  
SUPERIORE

# HIGH PERFORMANCE COMPUTING CENTRE

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## PRIVACY POLICY FOR HPC USERS

## Summary

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# 1 - About the privacy policy

This Privacy Policy explains how the High Performance Computing Centre (CHCP for short) of Scuola Normale Superiore ([www.sns.it](http://www.sns.it), "SNS" for short) collects, uses and discloses the personal data of users running numerical simulations, data analysis and other computing tasks ("computing services" for short) on the Trantor cluster (see <https://hpccenter.sns.it>). This Privacy Policy is written according to the EU Regulation 2016/679 (General Data Protection Rule, or GDPR) and, for topics not covered by GDPR, to Article 13 of legislative Decree n. 196/2003 - Codex regarding the protection of personal data (the "Privacy Code").

This policy applies only to the facilities listed above and not on any web site or computing resource accessed from the former but not managed by the CHPC staff.

This document applies to the CHCP documentation web page (<https://hpccenter.sns.it>) and to all computing resources and web applications listed and updated in the CHPC documentation.

This privacy policy has been reviewed and updated by the CHPC Committee on 07/01/2023 after consulting the SNS DPO.

## 2 - Data Controller and data processor

The data controller is Scuola Normale Superiore, Piazza dei Cavalieri, 7 - 56126 Pisa +39 050 509111 in the person of its legal representative, the SNS Director ([protocollo@sns.it](mailto:protocollo@sns.it)). The interested persons may make requests regarding their rights by sending an email to [dpo@sns.it](mailto:dpo@sns.it).

## 3 - Collection of data

### 3.1 Purposes of data collection

The data collection is intended only to ensure that the use of computing resources agrees with the purposes defined by the CHPC Committee and that the access to these resources does not endanger their security, the security of third parties (e. g. cyber-attacks), does not violate SNS policies and does not allow intellectual property infringements and license violations (e. g. download of academic papers or use of licensed software without rights). Data collection will follow the principles of article 5 of GDPR.

### 3.2 Type of collected data

Collected data refer to user activity on the CHPC computing platforms and include:

1. Account data: user name, scientific supervisor name, email address and other information collected when creating the account.
2. Login data on login nodes and compute nodes: time, source IP, connection duration, login attempts and similar information.
3. Requests to the web servers: access time, source IP, URL's path and parameters.

4. Use of computing resources as collected by the batch system, license servers of proprietary software (e. g. Matlab) and web applications.
5. Use of storage space on the shared areas (/home, /projects, /shared\_scratch) as collected by the storage system.
6. Network traffic from Trantor nodes towards external resources: user id, time, transport protocol, source and destination IP addresses and ports.

### 3.3 Conservation of data

Personal data will be kept for a period of 3 months after which it will be deleted, unless reason for further investigation or incidents related to a users' activity will take place during this time frame.

### 3.4 Processing of collected data

Collected data will not be automatically processed for any purpose but just collected and analyzed in case of incident, malfunction or suspected breaking of rules. Such investigation can take place without prior notice to the users. CHPC does not make any automated profilation or inference about users activity, as specified in article 22 of GDPR.

## 4 - Communication and conservation of collected data

Personal data will not be circulated. Data will be communicated upon necessity and authorization by the Data controller (after consulting the Data Protection Officer) to the authorized subjects in case of necessity. Data will be also communicated if required by applicable EU and Italian law or legal process, including in connection with lawful requests by law enforcement, national security, or other public authorities.

## 5 - Legal Basis for collecting

CHPC and SNS hold a legitimate interest in collecting data for the purpose of stopping abuse of computing resources, protection of other users data and activity, integrity of SNS equipment and adherence to AgiD guidelines (see <https://www.agid.gov.it/it/sicurezza/misure-minime-sicurezza-ict>) and GARR's Acceptable Use Policies (see <https://www.garr.it/en/acceptable-use-policies>). *Should the user disagree with this policy, the CHPC Committee will deny access to the computing services as described in <https://hpccenter.sns.it/page/wiki/index.html> and in section 3.3.*

## 6 - User rights

The interested users have the right, at any time, 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 21 of GDPR. Note that, as stated in sections 3.1 and 5, the impossibility of logging data as described in section 3.2 implies the cessation of the computing services. The interested party can exercise these rights by filing a request to the Data Processor. Users can also, under proper conditions, file a complaint with the Italian privacy supervision authority (<https://www.garanteprivacy.it>).