



PRIVACY POLICY FOR THE COLLECTION AND PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLE 13 OF REGULATION (EU) 679/2016 OF 27 APRIL 2016

This privacy policy is issued pursuant to Art. 13 of Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and in compliance with the legislation on the processing of personal data, as well as the free movement of such data.

In particular, this privacy policy refers to participation in the Open Day and orientation initiatives at the Politecnico di Milano and for sending communications on future events, initiatives and activities. Before communicating their data to the University, minors are invited to read the privacy policies carefully together with their parents or guardians. Parents or any legal representatives of underage users can exercise their rights by writing to privacy@polimi.it.

DATA CONTROLLER

Politecnico di Milano - Director General delegated by the pro-tempore Rector - contact: dirgen@polimi.it.

INTERNAL DATA PROCESSOR

Dr Assunta Marrese, Director of the Teaching Department - e-mail: assunta.marrese@polimi.it.

The data shall be processed by other persons authorised and instructed for this purpose in accordance with current legislation.

DATA PROTECTION OFFICER AND CONTACT DETAILS

E-mail: privacy@polimi.it - tel.: +39 02 23999378.

PURPOSES OF THE PROCESSING, LEGAL BASIS, CATEGORIES OF DATA AND RETENTION

For the purposes of applying the relevant European and national legislation (Regulation (EU) 679/2016, henceforth "Regulation"), we hereby inform you that your personal data shall be used for the following purposes:

TABLE 1

Purpose of the processing	Legal basis	Categories of personal data	Retention period
Purpose 1 Participation in the Open Day.	Consent (Art. 6, paragraph 1 a) of the Regulation).	<ul style="list-style-type: none">• Identifying data• Personal data• Contact details	7 years and in any case for a period of time not exceeding that necessary for the purposes for which the data were collected and processed.



Purpose 2 Participation in orientation events and individual interviews in hybrid mode (in person and remotely).			
Purpose 3 Sending news to data subjects on orientation and communication initiatives organised by the Politecnico and information on deadlines and procedures, as well as scientific dissemination by forwarding information also via e-mail or through social channels.	Public interest (Article 6, paragraph 1 e) of the Regulation.	<ul style="list-style-type: none">• Identifying data• Personal dataContact details	7 years and in any case for a period of time not exceeding that necessary for the purposes for which the data were collected and processed.
Purpose 4 Statistical activities and evaluation surveys.	Public interest (Article 6, paragraph 1 e) of the Regulation.	<ul style="list-style-type: none">• Identifying data• Personal data• Contact details	The data shall be archived and stored indefinitely in compliance with the principles of transparency, lawfulness, proportionality and minimisation.

For Purpose 1 shown in Table 1, participation in the Open Day requires registration for the specific event via a special App. The legal basis for the processing is the express consent given by the data subject when registering via the App.

The data subject also gives his/her express consent by voluntarily visiting the spaces where the Open Day is taking place (for example stands, presentation rooms, etc.), in which a photos and/or videos may also be recorded. These spaces will be clearly identified by an information sign with icons.

For more details about the App, please refer to the specific Privacy Policy.

We inform you that the events at the Politecnico di Milano may be subject to audio-video recordings. The data subject to processing, including images, audio/video recordings (hereinafter, the "Images"), even in partial and/or modified or adapted form, taken during the event shall be processed in full compliance with the Regulation. The data shall be processed, including with the aid of electronic means, by specifically assigned persons, for the purposes of dissemination and communication by the Politecnico di Milano. The images collected shall be stored, including in electronic form and on any media, for the purposes and within the limits outlined above and may be disseminated on institutional



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websites and via social networks (including but not limited to Facebook, Twitter, YouTube) pursuant to Italian Law No 150/2000.

The use of the images does not entitle the data subject to any compensation. The Politecnico di Milano has the right to access or disseminate the Images of the user without any consent, by virtue of Art. 97 of Italian Law No 633/1941. With the authorisation, the signatory grants non-exclusive license to use the materials, transferable to third parties and without duration or geographical limits. It includes the rights referred to in Articles 12 to 19 of the Italian Law No 633 of 22 April 1941, including but not limited to: right of publication; right of reproduction in any manner or form; right of transcription, editing, adaptation, processing and reduction; right of disclosure and distribution to the public, including the rights of projection, transmission and dissemination including in summarised and/or abridged version, by any technical means; right to keep a copy of the materials, including in electronic form and on any known technological support or future invention for the purposes and within the limits defined above. In any case, any use of the Images that may prejudice the honour, reputation or decorum of the person portrayed, filmed or recorded is excluded pursuant to the aforementioned article and pursuant to Article 10 of the Italian Civil Code.

NATURE OF THE DATA

The provision of the data requested for Purpose 1, shown in Table 1, is free and optional. However, the refusal to provide such data shall make it impossible to participate in the Open day.

PROCESSING METHODS

Personal data shall be processed in hard copy, computerised and telematic forms and inputted to the relevant databases, which may be accessed by the persons appointed by the Data Controller as Internal Data Processors and other persons in charge of the processing of personal data; these persons may consult, use, process, compare data and perform any other appropriate operation, including automated operations, in compliance with the provisions of the law, necessary for guaranteeing, inter alia, the confidentiality and security of the data, as well as the accuracy, updating and relevance of the data to the stated purposes.

In case of participation in the initiatives foreseen according to Purpose 2 in Table 1 via video conferencing platforms, this may entail the recording of participants during the recording of the event, as well as the collection of audio/video material in the event of active participation in the video conference.

The events shall be recorded using the features available on the platform chosen for holding the video conference. The video recording shall be stored on a server owned by the Politecnico di Milano.

All these operations shall be carried out in ways that guarantee maximum security and confidentiality by persons specifically appointed by the Politecnico di Milano.

For further information, please refer to the information and privacy policies of the various platforms used, accessible on the relative websites.

CATEGORIES OF RECIPIENTS

In relation to the purposes indicated, the data may be transmitted to companies and/or persons who provide services on behalf of the Data Controller, including external services, for the production, promotion and advertising of the event. The data may also be disclosed to partners who contribute to the organization of the event - including sponsors - and photographs and audio-video recordings may be disseminated on institutional sites, in



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brochures and publications in paper and electronic format, as well as in magazines - including online publications - and other multimedia material.

TRANSFER OF DATA TO NON-EU COUNTRIES OR TO INTERNATIONAL ORGANISATIONS

Personal data shall be processed by the Data Controller within the European Union.

Should it become necessary, for technical and/or operational reasons, to make use of entities located outside of the European Union, or should it become necessary to transfer some of the data collected to technical systems and services managed in the cloud and located outside of the European Union, the processing shall be regulated in accordance with the provisions of Chapter V of the Regulation and authorised on the basis of specific decisions by the European Union.

All of the necessary precautions shall therefore be taken to ensure the maximum protection of personal data, basing the transfer on:

- a) adequacy decisions on third country recipients as expressed by the European Commission;
- b) appropriate safeguards provided by the third party recipient pursuant to Article 46 of the Regulation;
- c) the adoption of binding corporate rules .

RIGHTS OF THE DATA SUBJECT

The data subject, in relation to the personal data covered by this privacy statement, is entitled to exercise the rights provided for by the Regulation, as outlined below:

- the data subject's right of access [Article 15 of the Regulation] (the right to be informed about the processing of their Personal Data and, if necessary, to receive a copy of it);
- the right to rectification of Personal Data [Article 16 of the Regulation] (the data subject's right to rectification of inaccurate Personal Data concerning him/her);
- the right to erasure of Personal Data without undue delay ('right to be forgotten') [Article 17 of the Regulation] (the data subject has the right to erasure of his/her data);
- the right to restriction of processing of Personal Data in the cases provided for in Article 18 of the Regulation, including in the case of unlawful processing or objection to the accuracy of Personal Data by the data subject [Article 18 of the Regulation];
- the right to object to the processing of Personal Data [Article 21 of the Regulation] (the data subject has the right to object to the processing of their Personal Data);
- the right not to be subject to automated decision-making [Article 22 of the Regulation] (the data subject has the right not to be subject to a decision based solely on automated processing).

Further information on the rights of the data subject can be found at www.garanteprivacy.it.

Where possible, Politecnico di Milano, in compliance with Article 19 of the Regulation, shall inform any recipients to whom the personal data have been disclosed of any rectifications, cancellations or restrictions of processing requested by the data subject.

With reference to the above-mentioned purposes, the data subject has the right to withdraw, at any time, the consent to the processing of identifying and personal data by sending an email to: privacy@polimi.it. Pursuant to Article 7 of the Regulation, the withdrawal of consent shall not affect the lawfulness of processing based on consent given prior to revocation.

Should the data subject believe that their rights have been compromised, they have the right to lodge a complaint with the Italian Data Protection Authority, in accordance with the procedures indicated by



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the Authority
[display/docweb/4535524](http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524).

at <http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb->

Milan, February 2023.