



**PRIVACY POLICY PURSUANT TO ART. 13 OF REGULATION (EU) NO 679/2016 OF 27
APRIL 2016**

This privacy policy is issued under 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 law on the processing of personal data and the free movement of such data.

In particular, this Privacy Policy refers to the messaging system for reporting malfunctions and failures/faults on university premises.

Data Controller

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

Internal Data Processor

Head of Infrastructure Management and Services (AGIS), contact: francesco.cavazzana@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. 02 23999378.

Purpose of data processing, legal basis, categories of data and retention period.

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:

Intended purpose of the personal data processing	Legal basis of the processing	Categories of personal data subject to processing	Retention period of personal data
Purpose 1 Reporting malfunctions and failures on property belonging to the Politecnico di Milano via messaging system.	Consent (Article 6, paragraph 1 a) of the Regulation).	<ul style="list-style-type: none">• Personal details (first name, surname) - possibly;• Contact details (telephone);• Personal Code	The collected data will be kept for a period of 3 months.



<p>Purpose 2 Managing reports of malfunctions and failures/faults on property belonging to the Politecnico di Milano via a ticketing system</p>	<p>Public interest of preserving and protecting university property (Art. 6(1)(e) of the Regulation).</p>	<ul style="list-style-type: none"> • Personal Code 	<p>The data collected will be kept for as long as necessary for managing the report and assessing the report management. The data (personal code) will be kept until the time limit for appeals has been reached and, in the event of legal proceedings, for the duration of those proceedings.</p>
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Nature of the data

The provision of the data requested for Purpose 1 and 2 is mandatory. In the event of failure to provide the data requested, the planned services/activities cannot be guaranteed.

Consent for Purpose 1 is understood to be given by the data subject by the positive action of initiating the conversation via WhatsApp. The data subject then gives their consent to activate the service of sending reports to Politecnico di Milano via WhatsApp instant messaging. Data is provided freely and voluntarily upon the consent of the data subject, which may be withdrawn at any time. In the absence of consent, the reports cannot be sent.

Processing methods

The processing carried out for the purposes described above may be performed digitally, by electronic or, in any case, automated means, including external databases: provider server.

For Purpose 1, by initiating the chat via WhatsApp, the user declares that they have read and agreed to the general terms and conditions of the instant messaging platform and explicitly accepts this privacy policy.

The service is open to anyone who wishes to report information of public utility relating to failures/faults and malfunctions encountered on property belonging to the Politecnico di Milano, for the purpose of resolving the issue(s) in question. WhatsApp is a free communication channel.

WhatsApp's terms and conditions of service can be found at: <https://www.whatsapp.com/legal/>.

WhatsApp's privacy policy can be found at:

<https://www.whatsapp.com/legal/privacy-policy>.

For Purpose 2, reports received by Politecnico di Milano via WhatsApp will be processed via tickets by the Contact Centre.



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Users can report failures/faults through a WhatsApp chat that will open automatically by scanning a QR code found on university premises; a chat bot will ask for a description of the failure/fault and the user's personal code; the person assigned to resolve the issue (Contact Centre operator/technician) will only interact directly with the user if further information is needed on the nature of the failure/fault (direct interaction will only be possible in the 24 hours immediately following the start of the chat). The assigned operator will open a ticket using the OTRS system in which they will enter the user's personal code only; in the case of users who do not have a personal code (non-university), the ticket will be opened without entering any personal data. The ticket will remain open until the failure/fault has been dealt with.

The data acquired for the aforementioned purposes shall only be accessed by duly authorised personnel.

Categories of recipients

The data processed for the purposes outlined above shall be disclosed or shall in any case be accessible to employees and collaborators assigned to the relevant departments at Politecnico di Milano, who, as authorized data processors, shall be duly and adequately instructed by the Data Controller.

In relation to the purposes indicated, personal data may be disclosed to the categories of public and/or private entities, or may be disclosed to companies, both in Italy and abroad, that provide services, including externally, on behalf of the Data Controller, where necessary appointed as data processor, through the university Contact Centre ticket.

Furthermore, your personal data may also be disclosed to other public administrations, even in anonymous or aggregate form, the event that such administrations are obliged to process these data for any proceedings of own institutional competence, as well as to all public entities to which, under the relevant conditions, disclosure is legally required under the provisions of the European system, laws or regulations, as well as insurance bodies for any accident reports.

In particular, the personal data processed will be handled by the following third parties:

- Link Mobility Italia S.r.l., with registered office in Via Paolo da Cannobio n. 37, 20122 Milan (VAT No 02153481201) appointed as Data Processor pursuant to Art. 28 of the Regulation.

Transfer to non-EU countries or 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 use entities located outside the European Union, or should it become necessary to transfer some of the collected data to technical systems and services managed in the Cloud and located outside the European Union, the processing shall be regulated in accordance with Chapter 5 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 of recipient third countries expressed by the European Commission;
- b) appropriate guarantees provided by the recipient third party under Art. 46 of the Regulation;
- c) the adoption of *Binding Corporate Rules*.

Rights of the data subject

As a data subject, you can ask the Data Controller for the following at any time:

- confirmation of any personal data held concerning you;
- access to your personal data and related information; the rectification of inaccurate data or the completion of incomplete data; the deletion of personal data concerning you (where any of the



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conditions indicated in Art. 17, paragraph 1 of the Regulation apply and in compliance with the exceptions provided for in paragraph 3 of the same article); the restriction of the processing of your personal data (where one of the conditions indicated in Art. 18, paragraph 1 of the Regulation applies), the transformation into anonymous form or the blocking of data processed in violation of the law, including those that do not need to be kept for the purposes for which the data were collected or subsequently processed;

As a data subject, you also have the right to object in whole or in part:

- for legitimate reasons, to the processing of personal data concerning you, even if pertinent to the purpose of the collection;
- to the processing of personal data concerning you for the purpose of sending advertisements on programmes and cultural events at Politecnico di Milano.

These rights can be exercised by contacting privacy@polimi.it.

If you believe that there has been a violation of your rights by the Data Controller and/or a third party, you have the right to lodge a complaint with the Data Protection Authority and/or other competent supervisory authority under the Regulation.

Milan, 30/08/2023