



PRIVACY POLICY FOR USERS ACCESSING HISTORICAL ARCHIVES PURSUANT TO ART. 13 OF REGULATION (EU) 679/2016 DATED 27 APRIL 2016

This privacy policy is issued in accordance with art. 13 of Regulation (EU) 2016/679 dated 27 April 2016 on the protection of natural persons with regard to the processing of personal data and in compliance with laws on the processing of personal data and on the free movement of such data.

The purpose of this privacy policy is to provide information on the data processed by the Library and Archives Services as part of its tasks carried out in the public interest, in accordance with the provisions of the Cultural Heritage and Landscape Act and in compliance with the Code of Ethics and Good Conduct with regard to Processing Personal Data for Historical Purposes (see Article 6(1)(e) of the GDPR, Regulation (EU) 2016/679).

DATA CONTROLLER

The Politecnico di Milano Data Controller is the Director General, delegated by the pro-tempore Rector – e-mail: dirgen@polimi.it.

DATA PROTECTION OFFICER AND CONTACT PERSON

Vincenzo Del Core - privacy@polimi.it - tel.: +39-02-23999378.

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

In application of European and national legislation on the subject (Reg. (EU) 679/2016, hereinafter the Regulation), please note that your personal data will be used for the following purposes:

Purposes of processing personal data	Legal basis for processing	Categories of personal data processed	Data retention period
Data supplied by users at the time of requesting access to the archives is collected and used exclusively to make accessible the premises and services offered by the Library and Archives Services, to allow use (consultation, reproduction) of the archival heritage stored therein, and to ensure the Services are properly managed.	<ul style="list-style-type: none"> To carry out the institutional activities of Politecnico di Milano (art. 6(1)(e) of the EU Regulation). 	<ul style="list-style-type: none"> Persona data (name, surname) Identification data (home address, type of user) Contact details (email address, telephone number). 	For a period of 20 years (the period is unlimited for data recorded in the Titulus records management system, which provides for unlimited daily records), or in any case for a period of time strictly necessary for the fulfilment of the purposes for which the data is processed.



<p>Personal data provided by users may also be processed or supplied to University / ACL staff to be processed for statistical purposes, also with a view to analysing and improving use of the historical archives.</p>	<ul style="list-style-type: none"> • To carry out the institutional activities of Politecnico di Milano (art. 6(1)(e) of the EU Regulation). 	<ul style="list-style-type: none"> • Personal data • Identification data 	<p>For a period of 20 years, or in any case for a period of time strictly necessary for the fulfilment of the purposes for which the data is processed.</p>
<p>Personal data contained in the documents belonging to the historical archives and acquired as a result of carrying out conservation, ordering and document communication activities is processed exclusively for the purpose of developing and providing users with tools for searching documentary sources and for the purpose of providing information on sources for historical research. These purposes aim to ensure free use of sources and the correct management of historical archives.</p>	<ul style="list-style-type: none"> • To carry out the institutional activities of Politecnico di Milano (art. 6(1)(e) of the EU Regulation). 	<ul style="list-style-type: none"> • Personal data • Identification data 	<p>For an unlimited period, or in any case for a period of time strictly necessary for the fulfilment of the purposes for which the data is processed.</p>

NATURE OF PERSONAL DATA

The data collected is mandatory. Failure and/or refusal to communicate the necessary data will make it impossible to access the services offered and to make use of the archival heritage preserved by the Library and Archives Services.

PROCESSING METHODS

Processing methods

Processing will be carried out, electronically and otherwise, by staff appointed by the Library and Archives Services or by the Museum Activities Service, according to procedures and using tools such as can guarantee the security and confidentiality of data.



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Data will be processed with the aid of computer tools to facilitate the retrieval of sources, but also through the use of online search instruments, and in any case in accordance with principles of fairness and non-discrimination against users accessing the historical archives (see Chapter I, Article 1 and Chapter II of the Code of Ethics and Good Conduct with regard to Processing Personal Data for Historical Purposes).

As far as is compatible, the Code of Ethics and Good Conduct with regard to Processing Personal Data for Historical Purposes shall apply for the purposes indicated under number 3, in accordance with art. 20 of Italian Legislative Decree no. 101 dated 10 August 2018.

CATEGORIES OF DATA RECIPIENTS

The data of anyone making use of the services offered will be collected.
Such data shall not be communicated to third parties.

TRANSFERRING DATA TO NON-EU COUNTRIES

Personal data may be transferred abroad, in accordance with the Regulations, also to countries outside the European Union, whenever this becomes necessary for one of the purposes set out in this privacy policy. In addition to those cases where the European Commission has issued a decision on an adequate level of protection for personal data, data shall be transferred to non-EU countries in such a way as to provide suitable and appropriate guarantees in accordance with articles 46 or 47 or 49 of the Regulation.

RIGHTS OF DATA SUBJECTS

At any time, the data subject may exercise the rights provided for by Regulation (EU) No. 679/2016, and more precisely:

- a. Right of access to personal data and all relevant information according to art. 15 of the Regulation;
- b. Right to have processed data rectified or rendered anonymous;
- c. Right to erasure of data ('right to be forgotten'), except for data contained in deeds which must necessarily be stored by the Politecnico di Milano and unless there are overriding legitimate grounds for the processing;
- d. Right to restriction of processing pursuant to art. 18 of the Regulation;
- e. Right to object to the processing of personal data concerning the data subject, without prejudice to the mandatory nature of data processing in order to benefit from the services offered;
- f. Right to withdraw consent for non-mandatory data processing, without thereby affecting the lawfulness of processing based on consent before its withdrawal.

PROCEDURE FOR EXERCISING RIGHTS AND LODGING A COMPLAINT

To contact the University's Data Protection Officer, please email privacy@polimi.it.

Data subjects may also lodge a complaint with the national data protection authority (www.garanteprivacy.it).