



POLITECNICO
MILANO 1863

PRIVACY POLICY AND DECLARATION OF CONSENT TO PERSONAL DATA PROCESSING UNDER ART. 13 OF EU REGULATION NO. 679/2016 OF 27 APRIL 2016

This policy is issued under art. 13 of Regulation EU 679/2016 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and in respect of the regulations on personal data processing, as well as on the free movement of such data.

This policy is related to the Welcome Week of the academic year 2023/2024, a time of welcoming new international students, which provides them with the necessary information for their Italian stay and academic career.

Data Controller

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

Internal Processor

Ms Chiara Bianca Pesenti, Head of Campus Life Area, Piazza Leonardo da Vinci 32, Milan (MI), tel. 02.2399.2428, e-mail: chiara.pesenti@polimi.it

The personal data will be processed by other authorised parties who will receive instructions for that purpose under current legislation.

Data protection Officer and contacts

Dr. Vincenzo Del Core, email: privacy@polimi.it - Ph.: 02-23999378.

Processing purposes and legal basis, categories of data and storage period

Under the relevant European and national legislation (Reg.EU 679/2016, hereafter Regulation), we inform you that your personal data will be used for the following purposes:

Table 1

Personal data processing purposes	Processing legal basis	Personal data categories	Personal data retention period
Purpose 1 Registration and participation in the Welcome Week of the academic year 2023/2024	Consent (Art. 6, paragraph 1, letter e) of Regulation EU).	<ul style="list-style-type: none">• Identification data (surname, name)• Contact details (email address)• Images and audio/video recordings	Data will be stored for two years from the event date.



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Purpose 2 Statistical purposes, retention and archiving.	Performing Politecnico di Milano institutional activities (art. 6, paragraph 1, letter e) of the Regulation	<ul style="list-style-type: none">• Personal data (Name, surname, professional title, affiliation to body/company)• Personal data (address - optional - telephone number - optional)• Images and audio/video recordings	The data necessary for the correct functioning of the public administration will be archived and stored indefinitely, in respect of principles of transparency, lawfulness, proportionality and minimisation.
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If the participant has a disability, under Art. 9, paragraph 2, letter a) of the EU Regulation, it is possible to give notice of this during registration, to take organisational measures for the smooth participation in the initiative. The processing of this data has its legal basis in the data subject consent.

The processed data, including images of filming and audio/video recordings, even in partial, modified or adapted format, made during the initiative will be processed under the EU Regulation. The processing legal basis is the data subject consent. This consent is given for public events organised by the University through the data subject voluntary action in going to places where a photographic or video service is carried out. These places will be clearly identified by means of a specific sign.

The data will be electronically processed by appointed persons for dissemination and communication activities on the Politecnico di Milano social media and streaming channels. The images collected will be stored, even in electronic form and on any technological systems for the purposes and within the limits defined above, and may be disseminated in accordance with Law no. 150/2000 on institutional websites and through social media networks (for example, Facebook, Twitter, Youtube, Instagram). The use of images does not give any right to compensation. Politecnico di Milano has the right to access or disclose the images without obtaining any consent, under Art. 97 of Italian Law no. 633/1941. This authorisation implies the granting of a non-exclusive licence, without time or geographical limits, transferable to third parties, for the use of the Materials, and includes the rights referred to in Articles 12 to 19 of Italian Law no. 633/1941, including but not limited to: right of publication; right of reproduction in any way or form; right of transcription, editing, adaptation, processing and reduction; right of communication and distribution to the public, including projection, transmission and broadcasting rights even in summary and/or reduced version, using any technical means, the right to keep a copy of the Materials, even in electronic form and on any known or future technological system for the purposes and within the limits defined above. Under the above article and art. 10 of the Italian Civil Code, any use of the images that may cause prejudice to the honour, reputation or decorum of the person portrayed, taken or recorded, is excluded.

Nature of the data

Providing data is optional.

Refusal to provide data for Purpose no. 1 listed in Table 1 will make it impossible for you to register and participate in the Welcome Week of the academic year 2023/2024.

Processing methods

For the purposes indicated in Table 1, the personal data may be processed on both paper and digital media, manually and/or using electronic or automated tools on the hard drive at the Politecnico di



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Milano data centre. Data may be stored in paper archives for the planned retention duration for documents relating to administrative procedures and in digital format indeterminately based upon obligations of transparency and proper functioning of the public administration.

Access to the data acquired for the purposes in Table 1 is permitted only to authorised personnel who have been given appropriate operating instructions, i.e. to students 150 hours and Tutors, relevant offices and support staff for organisational activities.

Categories of recipients

The data for Purpose 1 may be disclosed to internal and external parties who provide services on the Controller's behalf for the Welcome Week organisation. The data collected may be disclosed to the following third parties, as they collaborate in various ways with the initiative, for their own purposes within the initiative or similar events.

- YesMilano
- Partner companies of the Politecnico di Milano Career Service

Personal data may be communicated to other public administrations, including anonymously, if they need to process the data for their own institutional purposes, and to all public parties to whom, in the presence of the relevant conditions, the communication is mandatory under European law, standards or regulations, and to insurance companies for any accidents that may occur.

Special categories of data

Under Articles 9 and 10 of EU Regulation no. 2016/679, data qualifying as "special categories of data" particularly information relating to conditions of disability declared by the data subject during registration may be processed to guarantee their participation in the Welcome Week.

During registration and participation in the Welcome Week of the academic year 2023/2024, authorised staff may process special data which reveals the participant's racial or ethnic origin and religious or philosophical beliefs.

Transferring data to non-EU countries or international Organisations

For Table 1 Purposes, the registration data will not be transferred to non-EU countries or international organisations.

Data subject rights

As the data subject, you may request from the Controller:

- confirmation of the existence or otherwise of personal data concerning you;
- access to your personal data and related information; correction of inaccurate data or completion of incomplete data; deletion of your personal data (under one of the conditions indicated in Art. 17, paragraph 1 of the Regulation and in compliance with the exceptions provided for in paragraph 3 of the same article); limit the processing of your personal data (under one of the cases indicated in art. 18, paragraph 1 of the Regulation), the transformation into anonymous form or block on data processed in violation of the law, including data whose retention is no longer necessary for the purposes for which it was collected or processed.

As data subject, you have the right to partly or fully object:

- on legitimate grounds, to the processing of your personal data, even if it is relevant for the purpose for which the data was collected;



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- to the processing of your personal data for the purposes of sending promotional material on training initiatives and Politecnico di Milano's cultural events.

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

If you believe that your rights have been infringed by the data controller or a third party, you have the right to lodge a complaint with the Data Protection Authority or other relevant supervisory authority under the Regulation.

By ticking the appropriate boxes on the Welcome Week of the academic year 2023/2024 online registration form, the data subject expresses their free and full consent to the data processing for each of the purposes indicated in the policy within the limits in which their consent was legally required for its communication to parties listed in the same policy.

The data subject can withdraw their consent at any time. Consent withdrawal shall not affect the lawfulness of the processing based on the consent before withdrawal. The data subject shall be informed before giving their consent. The granting and revocation of consent are equally unproblematic.