

NOTICE ON THE COLLECTION AND PROCESSING OF DATA FOR PARTICIPATION IN THE EASTER/SUMMER CAMPS OF THE POLITECNICO DI MILANO

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.

Data Controller

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

Internal Data Processor

Dr. Chiara Pesenti, Manager of the Campus Life Area of the Politecnico di Milano, Building 3 - Piazza Leonardo da Vinci 32, 20133 Milan, contact: chiara.pesenti@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

Email: <u>privacy@polimi.it</u> - tel. + 39 02 23999378.

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

In accordance with European and national legislation (Regulation (EU) 679/2016 of 27 April, hereinafter "Regulation"), we hereby inform you that personal data provided directly by you 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 Participation of the minor in the Easter/summer camps of the Politecnico di Milano.	Consent (Art. 6, par. 1, letter a) of the EU Regulation).	 Personal data of the parents and of the child, boy/girl. Contact details; Tax information; Bank details. 	10 years
Purpose 2 To take photographs and record videos to document activities carried out.	Consent (Art. 6, par. 1, letter a) of the EU Regulation).	 Photos and videos of children 	5 years

For the purpose of registering the child, the data subject will be asked to provide particular data (i.e. data regarding the health of the child, in particular allergies, intolerances and any disabilities), the treatment of which will be carried out with prior explicit consent of the data subject pursuant to art. 9, par. 2, letter a) of the EU Regulation. The provision of particular data is mandatory if the minor has allergies, intolerances or disabilities. Otherwise the require of registration to the PoliMi Easter/ Summer camps will be rejected.



We inform you that the authorized personnel of the Politecnico or the service assignee may take some photos and record some videos of the minors attending the Easter/summer camps in order to document the teaching-educational activity. To that end, the child's parents or legal guardian will be asked for their explicit consent, and required to sign a specific release form for the use of the images. The images and videos, whether used as they are or in partial and/or modified or adapted form, will be processed in full compliance with the EU Regulation.

The data shall be processed, including with the aid of electronic devices, by specifically appointed persons, for broadcasting and communication by the summer and Easter centres. The images and videos collected will be stored, including in electronic form and on any technological support for the purposes and within the limits defined above, and may be disseminated in accordance with Italian Law no. 150/2000 on institutional websites, as well as through social network channels (including but not limited to Facebook, Twitter, YouTube).

The use of the images and videos does not entitle to any compensation.

With this authorisation, the signatory grants non-exclusive license to use the materials, transferable to third parties and without duration or geographical limits. This 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 images or videos 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 data is mandatory. Refusal to provide such data will make it impossible to meet the intended purpose and to access the Easter/summer camp of the Politecnico di Milano.

Processing methods

The requested data is collected through the on-line form/registration form and the related digital documents and processed with manual and/or IT tools, following an organizational and processing logic strictly related to the purpose indicated and in any case in such a way as to guarantee the security, integrity and confidentiality of the data.

The data is also stored in paper archives and in digital format for the duration of the Easter/summer camp and then for the period for which the Politecnico di Milano is obliged to retain such data for tax purposes or for other purposes required by law or by the Regulation; in any case the retention period must not exceed 10 years.

The data acquired for the participation in the Easter/summer camp shall only be accessed by duly authorized personnel. In particular, the personnel of the Politecnico di Milano working in the following offices is authorized to process and collect the requested data: HR & Organizational Development Division, Financial Management and Economics Division, Real Estate Division and Campus Life Division.

Special categories of data

At the time of registration, personal data belonging to special categories pursuant to art. 9 of the Regulation may be requested, e.g.:

- data concerning health (disability), in the case of disabled children, boys/girls;
- data relating to specific allergies/diets.



The data will be requested and processed by duly authorized personnel of the Politecnico, as well as by the service assignee, only to ensure maximum comfort and integration during the Easter/summer camp.

Categories of recipients

In accordance with the purposes indicated, the data will be communicated to the assignee of the service, i.e. the company Pro.ges Scarl, acting as External Data Processor pursuant to art. 28 of the EU Regulation and to the provider of the canteen service identified by the latter.

In particular, personal data may also be disclosed to other public administrations, including in anonymous form, in the event that the latter are obliged to process such data for any procedures within their institutional competence, as well as to any public entities to which, under the relevant conditions, disclosure is legally required by the provisions of European system, laws or regulations, in addition to insurance bodies for any accident reports.

Transfer to non-EU countries and/or international organisations

Personal data shall in no way be transferred to non-EU countries or international organizations.

Rights of data subjects

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 correction of inaccurate data or the completion of incomplete data; the cancellation of personal data concerning you (where any of the conditions indicated in Art. 17, paragraph 1 of the Regulation applies 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); 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 courses and cultural events at the Politecnico di Milano.

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

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