



POLITECNICO
MILANO 1863

PRIVACY POLICY UNDER ART. 13 OF EU REGULATION NO. 679/2016 OF 27 APRIL 2016 ELECTRONIC SELECTION PROCEDURE TESTS

This policy is for applicants in public selection employment procedures for Politecnico di Milano's technical and administrative staff. Due to the suspension of selection procedures during the COVID-19 epidemiological emergency, the platforms have been made available by Politecnico di Milano, to conduct tests electronically.

The personal data collected/registered for these purposes will be processed under EU Regulation 2016/679 (General Data Protection Regulation) and Legislative Decree 196/2003 and subsequent amendments and additions. (Personal Data Protection Code), as explained below.

Data controller

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

Data Protection Officer

Vincenzo Del Core - privacy@polimi.it - Ph. 02 23999378.

Electronic processing purposes and methods

Personal data may be processed using Teams or Zoom platforms, which have written and oral test selection methods and are held in the presence of the Selection Committee members, other applicants or any external viewers who have made a legitimate request.

The selection procedure tests will be in streaming mode and the audio/video streams will be recorded for the time strictly necessary.

The quality of the applicant's Internet connection during the selection procedure test (including the time and duration of any Internet disconnections); mouse, keyboard and screen activity; the video recording quality (lighting, contrast, movement); audio recording quality; applications and processes running on the computing device during the selection procedure test may be collected.

Please note that applicants are asked to identify themselves via webcam *in a confidential environment (breakout room)* which will be displayed in the video stream by the Committee President for identity verification purposes.

The provision of data is mandatory and failure to provide it will make it impossible to register for the selection procedure.

Processing legal basis

The processing legal basis is to be found, under art. 6, paragraph 1, letter e) and art. 9, paragraph 2, letter g) of EU Regulation 2016/679. Data processing is part of the institutional tasks entrusted to Politecnico di Milano and the electronic mode is included as a way to carry out the selection procedure under art. 6 letter z) of Prime Ministerial Decree of 3 December. "*Urgent measures to face the COVID-19 epidemiological emergency*", and Decree Law 16 May 2020, no. 33, converted with amendments, by Law 14 July 2020, no. 74, on: "*Urgent measures to face the COVID-19 epidemiological emergency*", and Decree Law 2 December 2020, no. 158, on: "*Urgent provisions to deal with health risks related to the spread of the COVID-19 virus.*"

Processing purposes can be found in the second level policies, published on the Politecnico di Milano website: www.polimi.it/privacy/.

Personal data retention period

Data is kept by Politecnico di Milano for the time necessary to achieve the above purposes. This is without prejudice to the ten-year or longer retention period to ensure legal administrative requirements which cannot be determined in advance, due to different legal processing conditions (e.g. legal proceedings that make the processing necessary for longer than ten years). The retention is permanent for selection procedure tests only.

For the processing of personal data entered into the information systems via audio-video streams, except in cases of dispute, reference is made to the principles set out in art. 5 of EU Regulation 2016/679, for a period not exceeding the fulfilment of the purposes and specifically the principle of retention limit under art. 5, letter e) of EU Regulation 2016/679.

Data recipient categories

Data will be processed exclusively by authorised parties and online service providers or platforms that, may become aware of data subject personal data, for the sole purpose to carry out the requested service. These parties are expressly appointed, under art. 28 of EU Regulation 2016/679, as Data Processors. Data subject data may be processed by system administrators authorised by the Data Controller to carry out IT services. It is possible to know the identity of system administrators or the updated list of Data Processors by writing to the Data Controller.

Data transfer abroad and dissemination

Your data may be transferred abroad to carry out Politecnico di Milano activities and processed by parties who fall within the categories mentioned in the paragraph above.

If for technical or operational reasons it becomes necessary to use parties located outside the European Union, or transfer some of the data collected to technical systems and services managed in the cloud and located outside the European Union, the processing will be regulated under the provisions of Chapter V of the EU Regulations and authorised based on EU decisions. Precautions will be taken to ensure the most complete protection of personal data, basing such a transfer: a) on adequacy decisions of the receiving third-party countries expressed by the European Commission; b) on adequate safeguards expressed by the receiving third party under art. 46 of the EU Regulation; c) on the adoption of Corporate binding rules; d) on signed SCCs.

Data subject rights

The data subject has the rights set out in sections 2, 3 and 4 of Chapter III of EU Regulation 2016/679. This includes the right to request the following from the Data Controller: access to their personal data, correct or delete data, limit their data processing, oppose the processing and data portability.

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

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

For further data processing information, please refer to the software and applications policies adopted to provide the service.