Privacy policy for sending central administration communications via the WhatsApp Business broadcast list.

PRIVACY POLICY UNDER ART. 13 OF EU REGULATION 2016/679

Under Article 13 of EU Regulation 2016/679 we inform you that your data is processed by Politecnico di Milano - Public Engagement and Communication Area, so that central administration communications on useful information, Politecnico di Milano internal events and services can be sent.

Data Controller

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

Internal Data Processor

Dr Chiara Bianca Pesenti - e-mail: chiara.pesenti@polimi.it - ph.: 02 2399 2428

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

Data Protection Officer and contact details

Dott. Vincenzo Del Core, e-mail: privacy@polimi.it - ph.: 02 2399 9378

Personal data collected

The personal data collected relates to identification data (first and last name, mobile phone number) and professional qualification.

This data is provided directly by the data subject.

Data processing purposes

The personal data processing purpose is to send communications to Politecnico di Milano internal community: Technical-Administrative Staff, Teaching Staff, Research Fellows, Contract Lecturers and PhD Students. Communications will concern aggregation and networking initiatives, new services, and useful information such as operational and logistical notices.

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

Purposes	Legal basis	Personal data categories	Retention period
Sending communications relating to the Politecnico's aggregation and networking initiatives, new services, useful information such as operational and logistical notices via WhatsApp Business - broadcast lists. The data will be processed only to organise and managing the information service.	Consent (art. 6, paragraph 1, letter a) of the EU Regulation).	 Identifying details; Contact details (mobile phone); Professional qualification (PTA or PD or Researcher or Research Fellow etc.). 	For a maximum of three years.

Nature of data

The provision of data is optional. Failure to provide consent will make subscribing to the Politecnico di Milano broadcast list impossible. Consent is free and voluntary and shall be considered expressed using the channel subscription form. If there is no subscription to the broadcast list, it will still be possible to access the information communicated using the above list, by accessing institutional channels such as the intranet or other University websites.

Processing methods

The above-mentioned communications will be sent through the instant messaging system Whatsapp Business via the Broadcast List function. This allows an identical message containing simple text or a multimedia element to be sent to several contacts at the same time, in a single chat. The broadcast message will appear as a single message sent by Politecnico di Milano and the users on the list will not be able to read others' messages or replies and, similarly, any reply messages will remain confidential.

The messages conveyed may contain text, images, videos, and links to full articles.

The user can choose whether to receive the message in Italian or English.

The message may be customised according to the user's profile.

The data provided will only be used to manage the information service.

The service is provided through the WhatsApp platform. Please refer to the relevant privacy policy.

Personal data will be processed electronically by staff duly authorised to manage the channel.

Profiling

For correct and transparent data processing purposes, we inform data subjects that the service registration data will be profiled to identify the professional category to which they belong (e.g. Technical-Administrative Staff or Teaching Staff). This is a non-automated profiling process, but promoted exclusively to send correct communications based on one's role. In this case, explicit consent will be required. Failure to consent will prevent the communications being sent to your category.

Transferring data to non-EU countries or international organisations

Your data may be transferred abroad to carry out important activities related to the WhatsApp platform, according to the policy found by clicking on the link above.

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), transformation into anonymous data or block data processed in violation of the law, including data for which storage is unnecessary for the purposes for which it was collected or processed.

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.

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. Consent can be withdrawn as easily as it is given.

Amendments and updates

This privacy policy is valid as of 1 March 2021. Politecnico di Milano - Public Engagement and Communication Area may make changes or additions to this policy if there are legal changes or additions. The data subject may view the constantly updated policy text on the website https://www.polimi.it/privacy/.