



POLITECNICO
MILANO 1863

INFORMATION AND DECLARATION OF CONSENT TO THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF EU REGULATION no. 679/2016 OF 27 APRIL 2016

The current policy is issued in accordance with art. 13 of EU Regulation no. 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 laws on the processing of personal data and on 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. Federico Colombo - Head of Research, Innovation and Corporate Relations - Piazza Leonardo da Vinci, 32, Milan (MI), email: careerservice@polimi.it.

Personal data will be processed by additional authorised parties who will receive instructions for this purpose in compliance with applicable regulatory provisions.

Data protection Officer and points of contact

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

Purposes and legal basis of the data processing, categories of data and data retention period.

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

Purposes of personal data processing	Legal basis for processing	Categories of personal data processed	Data retention period
Purpose 1: management of placement activities, including internship, assessment and institutional communication.	To carry out the institutional activities of Politecnico di Milano (art. 6, paragraph 1(e) of the EU Regulation) and to fulfil the requirements of law (Legislative Decree 276/2003, Law no. 183 of 4 November 2010).	<ul style="list-style-type: none">• Identification and personal data (company contacts/students and graduates);• Personal and career data (of students/graduates).	Data regarding university careers, including that relating to internships, will be retained indefinitely for reasons of transparency and the proper functioning of the public administration. Data processed for the purposes of placements and vocational guidance will be retained for the period necessary for carrying out such activities



			and/or for the duration of the agreement.
Purpose 2: management of operations relating to and consequent on the establishment of employment contracts.	Contract (art. 6, paragraph 1(b) of the EU Regulation).	<ul style="list-style-type: none">• Identification data• Contact details• Personal data• Tax details• Financial data (companies)	Data regarding university careers, including that relating to internships, will be retained indefinitely for reasons of transparency and the proper functioning of the public administration. Data processed for the purposes of placements and vocational guidance will be retained for the period necessary for carrying out such activities and/or for the duration of the agreement.

Events organised by the Politecnico di Milano to facilitate the meeting of labour supply and demand may involve the collection of photos and audio/video clips of the participants.

Images and/or audio/video clips collected for the fulfilment of Purpose 1 may be disseminated pursuant to Law no. 150/2000, “Regulations governing the information and communication activities of the public administration”, on the institutional sites as well as via social network channels (for example, but not limited to, Facebook, LinkedIn).

Lastly, note that the communication and/or dissemination of images and/or audio/video clips entails the granting of a non-exclusive licence, of unlimited duration and for the whole world, which is transferable to third parties. This licence includes the rights set out in articles 12 *et seq.* of Law no. 633/1941 including, by way of example but not exhaustively, the right of publication, the right of reproduction in any way or form, the right of transcription, editing, adaptation, processing and reduction; the right to communicate and distribute to the public, including the rights of projection, transmission and broadcasting (purely by way of example via IPTV, mobile terminals, VOIP, digital channels, etc.), including in summary and/or reduced form, using any technical means, the right to keep a copy of the images, including in electronic format and on any technological device that is known or may be invented in the future, for the purposes and within the limits defined above. The use of the images does not give any entitlement to payment.

In any case, this excludes any use of the picture/portrayal that may cause prejudice to the honour, reputation or dignity of the person portrayed, photographed or recorded.

Type of data



POLITECNICO
MILANO 1863

The provision of data is optional. Refusal to provide data means that it will not be possible to provide the services indicated. The data collected is mandatory.

Processing methods

Processing for the above-mentioned purposes can be carried out both on paper and digitally, manually and/or with electronic or automated tools, including in-house or external databases. They are also retained in paper archives as well as in digital format as per the period indicated above. Duly authorised persons are entitled to access the data acquired for the above-mentioned purposes.

Specifically, personal data is collected using the following methods:

a. Data provided directly by the data subject: personal data is collected directly from the data subject when the latter asks for information on activities, following a request to participate in a placement event organised by the Politecnico, via registration on the website www.careerservice.polimi.it, or in any other way that involves the direct communication of personal information. It is also possible to collect this type of information if it is voluntarily made public by the data subject when they interact with University departments.

b. Data provided indirectly by the data subject: personal data might also be shared with the Politecnico di Milano by third parties, e.g. organisers of independent events or organisations and associations affiliated with the University (e.g. Politecnico di Milano Alumni Association). The Politecnico di Milano may receive information on the data subject from foundations, associations and institutions connected with the University's initiatives and missions. These independent third parties will do this only if the data subject has indicated, by giving their consent, that they are interested in initiatives relating to the world of work. Please therefore refer to the information on data processing provided by the third parties involved.

c. Data from other public sources: apart from the information provided directly or indirectly, personal data may also be collected from publicly available sources, e.g. from reliable daily newspapers, company websites or social networks.

Duly authorised persons are entitled to access the data acquired.

Categories of recipients

Personal data relating to students and company contacts collected for Purpose 1, as shown in the table, may be communicated to public and/or private entities or individuals.

Personal data relating to companies, as well as any personal data relating to students collected for Purpose 2, as shown in the table, may be communicated to public and/or private entities or individuals.

Specifically, personal data may also be communicated to managers of online teaching platforms, and to other public administrations - including in anonymous form if the latter need to process such data for purposes within their institutional remit - and to any public entities (if the necessary preconditions are met) to whom the communication of personal data is required by EU rules or by domestic legislative and regulatory provisions, as well as to insurance companies when any accident files are opened.



POLITECNICO
MILANO 1863

Data retention period .

At the end of the data retention period, as set out in Table 1, and where there are no data pertaining to data subjects' university careers, for which a permanent retention period is stipulated, the data shall be deleted or anonymised.

Transferring data to non-EU countries

Data collected for the pursuit of the above-mentioned purposes may have to be transferred to a non-European Union country (a “third country”). The Data Controller specifies that transfers to non-EU countries will only be made to third countries for which there is an adequacy decision of the European Commission (art.45 of the GDPR) or to third countries that provide one of the guarantees indicated as adequate by art.46 of the GDPR.

Rights of data subjects

As the data subject, you may at any time ask the Data Controller:

- for confirmation of the existence or otherwise of personal data concerning you;
- for access to your personal data and information relating thereto, the correction of inaccurate data or addition to incomplete data, the deletion of personal data pertaining to you (when one of the conditions occurs that are indicated in . 17, paragraph 1 of the Regulation, and in accordance with the exceptions provided for in paragraph 3 of said article); the restriction of processing of your personal data (when one of the cases applies that are indicated in art. 18, paragraph 1 of the Regulation), the conversion into anonymous form or the blocking of data processed illegally, including that which does not need to be stored for the purposes for which said data was collected or processed at a later time.

As the data subject you are also entitled to object in whole or in part:

- on legitimate grounds, to the processing of personal data concerning you, even if relevant to the purpose for which the data was collected;
- to the processing of your personal data for the purposes of transmitting promotional material on training initiatives and cultural events of the Politecnico di Milano.

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

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