



POLITECNICO
MILANO 1863

SECOND LEVEL INFORMATION REGARDING THE PROCESSING OF STUDENTS' DATA

This information is provided in accordance with **art. 13 of EU Regulation 2016/679 of 27 April 2016** on the protection of individuals with regard to the processing of personal data and in compliance with the law on the processing of personal data.

This information is addressed to all those who can be identified as students of Politecnico di Milano, and to the services dedicated to them.

DATA CONTROLLER

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

INTERNAL DATA PROCESSOR

Dr. Assunta Marrese, Head of the Didactic Area, e-mail assunta.marrese@polimi.it.

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

DATA PROTECTION OFFICER AND CONTACT PERSON

Dott. Vincenzo Del Core, e-mail: privacy@polimi.it, tel.: +39-02-23999378.

LEGAL BASIS AND PURPOSE OF THE PROCESSING

Data is processed exclusively for the institutional purposes of public interest provided for by the laws on the training course, in compliance with the principles of lawfulness, correctness, transparency, adequacy, relevance and necessity pursuant to art. 5 of Regulation (EU) 679/2016.

The legal basis of the processing is found for the common and contact data in art. 6, paragraph 1, letter e) of the EU Regulation, while for the particular data potentially required during the course of the student's career, can be found in art. 9, paragraph 2, letter g) 'substantial public interest', as also provided for in art. 2 sexies, paragraph 2, letter bb)



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"education and training in the school, professional, higher or university field; of Legislative Decree 196/2001, as amended by Legislative Decree. 101/2018.

The Politecnico di Milano collects the following categories of personal data:

A. Identification and contact data

The Politecnico di Milano collects data related to:

- biographical information such as name, title, date of birth, age and gender;
- image of the student (collection with photo, also for participation in distance exams, and videos);
- contact details including address, e-mail address and telephone number;
- information showing periods of residence, stay or domicile at the residences and/or other places;
- information showing family relationships (e.g. through ISEE - Equivalent Economic Situation Indicator);
- national insurance number (or other tax identification number) and passport number, or details of national identity card, country of residence and nationality;
- financial and banking data for the payment of tuition fees.

The Politecnico di Milano will also assign a student number and a username for telematic services.

B. Student and academic life

The Politecnico di Milano collects data related to:

- admission, enrolment, academic career, i.e. completed courses, dates of enrolment, registration of their attendance and exam results;
- records of assessments, exams taken, grades obtained, disciplinary sanctions and other information kept in the records of your career as a student;
- information related to school and academic history;
- information on communications sent by the Politecnico di Milano and received by the student both for institutional purposes and for the promotion of events and other initiatives promoted by the Politecnico di Milano;
- recordings of participation in the events (also online) of the Politecnico di Milano;



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C. Transactions

The Politecnico di Milano collects data related to:

- details of financial transactions e.g. fees for courses the student is enrolled in and payments for services used.

The Politecnico di Milano may also collect the following special categories of personal data, where necessary for the purposes set out in this policy:

- information about your health and medical condition (e.g. disability, allergies and other needs);
- information regarding ethnic origin and other categories of special data necessary to ensure access to studies.

The data will then be processed in order to be able to manage the application for admission to the courses of study, enrolment and administrative career, including participation in tests and exams, at the Politecnico di Milano, and to prepare what is necessary to allow, always for institutional purposes, for particular security needs, the use of technological tools for access purposes containing personal information, which are read through special recognition devices.

Subsequently, in the event that the application for admission is successful, the data will also be processed to manage the entire university career until the continuation of the student status, as identified in the **Regulations for the Career of Politecnico di Milano students, available in the "University Regulations" section** of the University website (<http://www.normativa.polimi.it/>).

Finally, when the student leaves the university, the same data will be processed to manage the required certifications.

The data collected will be processed in order to carry out the following activities:

- enrolment in and attendance of university courses, both face to face and in e-learning mode;
- university career management;
- management of curricular and extracurricular traineeships;
- calculation of the fees due;
- if they complete their degree;
- use of telematic and e-mail services;
- use of library services;



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- access to laboratories and other secure facilities;
- sending and communicating information about the student's university career;
- application of workplace safety measures in accordance with the provisions of Legislative Decree 81/2008;
- disciplinary proceedings against students;
- surveys for the evaluation of teaching and customer satisfaction;
- filing and storage of university career data (studies carried out, positions held, qualifications obtained);
- elections representing students and for any tasks related to the elected office held by the person concerned in the governing bodies of the University;
- outbound orientation and job placement activities;
- use of contributions, facilities and services related to the right to university study;
- statistics and historical and scientific research, on aggregate or anonymous data, with no possibility of identifying the user.
- processes related to the drafting of the final papers for the different courses of study;
- services provided to support users with specific learning disabilities and disorders (DSA - disabilità e disturbi specifici di apprendimento);
- services provided in the field of counselling and psychological support (PoliPsi);
- student mobility, inbound and outbound;
- enrolment and certification for participation in events and training courses and Summer Schools;
- accreditation procedures for courses of study;
- admission test/verification of initial knowledge;
- state exams;
- career management for students in gender transition;
- provision of services for students in prison or under restriction of their personal freedom;
- participation in tests and exams for academic evaluation;
- administration of social and sports activities with the Politecnico di Milano;
- the recording of audio/images for university purposes, to be used in the University's official promotion channels and materials. These materials may be disseminated on the website, social media channels, in press releases and mailings, and on event posters;
- communications regarding events of the Politecnico di Milano;
- assistance and information for the student, through the OTRS TICKET management system or via e-mail and chat systems.

NATURE OF PERSONAL DATA



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The nature of the provision of personal data is to be considered mandatory.

Failure to provide data makes it impossible to carry out the operations necessary to establish the relationship between the student and the University, therefore, the purposes envisaged and the correct administrative and didactic management of the student's career, necessary to carry out the fulfilments required by law.

The processing of any aggregated or anonymous data does not provide for the application of EU Regulation n. 679/2016.

CATEGORIES OF DATA FOR THE CALCULATION OF THE FEES DUE

In accordance with art. 14 of EU Regulation no. 679/2016, the purpose relating to the calculation of the university fees due involves the request by the Politecnico di Milano for information relating to the ISEU value [University Equivalent Economic Situation Indicator], the composition of the family nucleus, as well as all the information contained in the DSU [University Financial Aid] directly from the INPS database in application of D.P.C.M. [Prime Ministerial Decree] 5 December 2013, n.159, provided that they are relevant and not excessive for the same purpose, in order to apply any benefits provided.

PARTICULAR CATEGORIES OF DATA

For the processing purposes already indicated, special categories of data such as: racial and ethnic origin (for non-EU citizens, and for refugee status) may be collected and processed in specific situations at the request of the data subject;

- state of health (in case of pregnancy or for students with disabilities);
- state of health (in case of pregnancy or for students with disabilities);
- judicial data (for detained users and students);
- sex life (for possible rectification of sex assignment).

CATEGORIES OF DATA RECIPIENTS AND POSSIBLE DATA TRANSFER

The data processed for the above purposes will be communicated to, or will in any case be accessible to the teachers of the chosen course of study and to the employees and collaborators assigned to the competent offices of the Politecnico di Milano who, being authorised to process data, will be suitably instructed by the data controller.

The University may also communicate the personal data it holds to other public administrations or foreign subjects (i.e. embassies) if they have to process such data for



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any proceedings that fall within its institutional competence, as well as to all public subjects to whom, in the presence of the relevant prerequisites, the communication is obligatorily required by Community provisions, laws or regulations, as well as insurance bodies when accident files are opened.

In particular, the personal data processed will be transmitted to the following third parties:

- MIUR;
- MIUR Research Bodies;
- MEF;
- ISTAT;
- CRUI - (Conference of Italian University Rectors);
- Ministry of Health;
- Ministry of the Interior;
- Ministry of Foreign Affairs;
- INPS;
- Italian Revenue Agency;
- CAF;
- European Community;
- Police Headquarters, Prefecture, Public Prosecutor's Office, Embassies, State Bar;
- Judicial authority;
- Insurance companies and INAIL;
- Universities and foreign academic and research institutions;
- Professional Orders and Trade Associations;
- CINECA;
- CISIA;
- CNUDD - National Conference of University Delegates for Disability;
- CALD - Coordination of Lombardy Universities for Disability and DSA;
- National Agency INDIRE;
- National Register of Students, as required by Law 170 of 11 July 2003;
- Public and private entities requesting confirmation of self-certifications received, pursuant to the "Testo unico delle disposizioni legislative e regolamentari in materia di documentazione amministrativa" - D.P.R. [Decreto del Presidente della Repubblica] (Presidential Decree) 28 December 2000, n° 445, amended by Article 15 of Law No. 183 of 2011;
- Politecnico Treasurer Bank for services related to financial transactions;
- Sostanza Srl, a company that provides information exchange tools between students and University staff (LiveHelp chat system);
- Other companies supplying "Software as a service" (SaaS) used by the University;
- Companies used to scan personal data cards used to carry out Ministerial tests;
- Natural or legal persons who provide consulting services or who collaborate with the Politecnico to provide the benefits of the right to study;



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- SOSTANZA Srl, supplier of the Livehelp system of chat transcription.

TRANSFERRING DATA TO NON-EU COUNTRIES

Personal data may be transferred abroad, in accordance with the Regulations, also to countries outside the European Union, whenever this becomes necessary for one of the purposes set out in this privacy policy.

In addition to those cases where the European Commission has issued a decision on an adequate level of protection for personal data, data shall be transferred to non-EU countries in such a way as to provide suitable and appropriate guarantees in accordance with articles 46 or 47 or 49 of the Regulation.

PROCESSING METHODS

The processing performed for the above purposes may be carried out either on paper or digital media, manually and/or with electronic or, in any case, automated tools, including in-house databases: and/or external databases of companies and consortia: CINECA, CISIA, Sostanza Srl, as well as other companies that provide "Software as a service" (SaaS) used by the University.

RETENTION PERIOD

The data collected will be stored with the use of appropriate security measures to allow access to duly authorised personnel, and to guarantee that it remains confidential and integral.

The storage period will be determined according to the principle of necessity of processing. Therefore, with regard specifically to storage times, the data and documents containing data will be kept for the period necessary to fulfil legal obligations and management, administrative and educational requirements. In particular:

- university career data will be kept indefinitely, taking into account the archiving obligations provided for by current legislation;
- data relating to the use of computer systems (e.g. time and duration of connection) or the use of electronic mail will be processed by automated tools and stored only for the time strictly necessary to achieve the purposes for which they were collected, unless otherwise provided for by law (~~maximum 12 months~~);
- data relating to any disciplinary proceedings to which it may be subject will be kept indefinitely, except in cases where the final decision is annulled by a final judgment or revoked by the administration.



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This data is also stored in hardcopy archives and in digital format for an indefinite period of time, due to the obligations of transparency and proper functioning of the public administration.

DATA SUBJECT RIGHTS

At any time, the data subject may exercise the rights provided for by Regulation (EU) No. 679/2016, and more precisely:

1. Right of access to personal data and all relevant information according to art. 15 of the Regulation;
2. Right to have processed data rectified or rendered anonymous;
3. Right to erasure of data ('right to be forgotten'), except for data contained in deeds which must necessarily be stored by the Politecnico di Milano as processed for reasons of public interest, and unless there are overriding legitimate grounds for the processing;
4. Right to restriction of processing pursuant to art. 18 of the Regulation;
5. Right to object to the processing of personal data concerning the data subject, without prejudice to the mandatory nature of data processing in order to benefit from the services offered;
6. Right to withdraw consent for non-mandatory data processing, without prejudice to the lawfulness of the processing based on the consent given prior to the withdrawal.

PROCEDURE FOR EXERCISING RIGHTS AND LODGING A COMPLAINT

To contact the University's Data Protection Officer, please email privacy@polimi.it.

Data subjects may also lodge a complaint with the national data protection authority (www.garanteprivacy.it).