



**POLITECNICO**  
MILANO 1863

## **PRIVACY POLICY PURSUANT TO ARTICLES 13 OF REGULATION (EU) 679/2016 OF 27 APRIL 2016**

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](mailto:dirgen@polimi.it).

### **Data Protection Officer and contact details**

E-mail: [privacy@polimi.it](mailto:privacy@polimi.it).

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

For the purposes of applying the relevant European and national legislation (Regulation (EU) 679/2016, henceforth "Regulation"), we hereby inform you that your personal data will be used for the following purposes:

| <b>Intended purpose of the personal data processing</b>                                                                    | <b>Legal basis of the processing</b>                                                                                                        | <b>Categories of personal data subject to processing</b>                                                                                                                                                         | <b>Retention period of personal data</b>                                                                                                                                                                                                                                                                                          |
|----------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Purpose 1:</b><br>management of placement activities, including internship, assessment and institutional communication. | Public interest (Art. 6, paragraph 1 e) of the Regulation) as well as by legal obligation (Leg. Decree 276/2003, Law No 183 of 04/11/2010). | <ul style="list-style-type: none"><li>• Identifying and personal data (company contacts/students and graduates);</li><li>• Personal details and information on academic career (of students/graduates)</li></ul> | Information on university careers, including internships, will be retained indefinitely due to the obligations of transparency and good functioning of public administration.<br>The data processed for placement and career guidance purposes will be processed for the period necessary for these activities to be carried out. |



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| <b>Purpose 2:</b><br>management of operations relating to and resulting from the establishment of partnership agreements.                                | Contract<br>(Art. 6(1)(b) of the Regulation).        | <ul style="list-style-type: none"><li>• Identifying data</li><li>• Contact details</li><li>• Personal details</li><li>• Tax information</li><li>• Financial information (companies)</li></ul>              | Information on university careers, including internships, will be retained indefinitely due to the obligations of transparency and good functioning of public administration.<br>The data processed for placement and career guidance purposes will be processed for the period necessary for these activities to be carried out. |
| <b>Purpose 3:</b> to prepare statistical reports and carry out further surveys (e.g. periodic monitoring of working conditions, students and graduates). | Public interest<br>(Art. 6(1)(e) of the Regulation). | <ul style="list-style-type: none"><li>• Personal details</li><li>• Information on academic career (of students/graduates)</li><li>• Contact details (of students/graduates; of company contacts)</li></ul> | The data used for this purpose shall be processed only for the performance of these activities.                                                                                                                                                                                                                                   |

On the occasion of events organised by the Politecnico di Milano to facilitate the matching between labour supply and demand, photos and audio/video footage of participants may be collected.

The images and/or audio/video footage collected in the fulfilment of Purpose 1 may be disseminated pursuant to Law No 150/2000, 'Regulations on information and communication by public administrations', on institutional websites and through social network channels (including but not limited to Facebook and LinkedIn).

Finally, it should be noted that the disclosure and/or dissemination of images and/or audio/video recordings implies the granting of a non-exclusive, unlimited, worldwide licence, transferable to third parties. This licence includes the rights referred to in Article 12 et seq. of Law No 633/1941, including but not limited to: the right of publication; the right of reproduction in any manner or form; the right of transcription, editing, adaptation, processing and reduction; the right of communication and distribution to the public, including the rights of projection, transmission and broadcasting (e.g. via IPTV, mobile terminals, VoIP, digital channels, etc.), even in a summarised and/or abridged form, by any technical means; the right to keep a copy of the images, even in electronic form and on any known or future invented technological support for the purposes and within the limits defined above. The use of the images does not entitle the data subject to any compensation.

Personal images shall not be used in any way that could prejudice the honour, reputation or dignity of the person portrayed, filmed or recorded.

### **Nature of the data**

The provision of data is optional. Refusal to provide the data prevents us from providing the services



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indicated. The data collected are mandatory in nature.

### **Processing methods**

The processing carried out for the purposes described above may be carried out either on paper or digitally, manually and/or by electronic or, in any case, automated means, including in-house or external databases. They data shall also be stored in paper archives as well as in digital format as per the period indicated above. The data acquired for the aforementioned purposes shall only be accessed by duly authorized personnel.

In particular, personal data are collected in the following ways:

**a. Data provided directly by the data subject:** personal data are collected directly from the data subject when they request information on activities, following a request to participate in a placement event organised by the Politecnico, by registering on the website [www.careerservice.polimi.it](http://www.careerservice.polimi.it) or in any other way that involves the direct communication of personal information. It is also possible that this type of information may be collected if made public voluntarily by the data subject when interacting with university services;

**b. Data provided indirectly by the data subject:** the data subject's personal data may be shared with the Politecnico di Milano by third parties, e.g. independent event organisers or organisations and associations linked to the university (such as the Politecnico di Milano Alumni Association). The Politecnico di Milano may receive information on the data subject from foundations, associations and institutions that are connected to the university's initiatives and missions. These independent third parties will disclose such information only if the data subject has indicated, through giving their consent, that they are interested in job and career-related initiatives. Therefore, please refer to the privacy policies of the third parties involved for details of their data processing.

**c. Data from other public sources:** in addition to information provided directly or indirectly, personal data may be collected from publicly available sources, including information from, for example, reliable newspapers, corporate websites, social networks.

Personal data may be processed through online platforms or services currently used at the Politecnico di Milano also for the purpose of creating remote meetings between company representatives, career service representatives and students/graduates.

The data acquired for the aforementioned purposes shall only be accessed by duly authorised personnel.

### **Categories of recipients**

The personal data of students and company representatives collected for Purpose 1 in the table may be disclosed to public and/or private entities.

Personal data relating to companies and/or corporations, as well as possibly the personal data of students, collected for Purpose 2 in the table may be disclosed to public and/or private entities. Finally, personal data may also be disclosed to operators of online teaching platforms and also to other public administrations, including in anonymous form in the event that such administrations are obliged to process these data for any proceedings within their institutional competence, as well as to all public entities to which, under the relevant conditions, disclosure is legally required under European provisions, laws or regulations, as well as to insurance companies for any accident reports.

For Purpose 3 (statistical survey), the following subjects or categories of subjects may have access to the data indicated: research bodies and institutes and subjects in charge of providing technological support, in their capacity as data processors.



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### **Retention period of personal data**

At the end of the retention period, as set out in table one, and where there is no university career data for which retention is indefinite, the data shall be deleted or rendered anonymous.

### **Transfer to non-EU countries and/or international organisations**

The personal data shall be processed by the Data Controller within the European Union.

Should it become necessary, for technical and/or operational reasons, to make use of parties located outside of the European Union, or should it become necessary to transfer some of the data collected to technical systems and services managed in the cloud and located outside of the European Union, the processing shall be regulated in accordance with the provisions of Chapter V of the Regulation and authorised on the basis of specific decisions by the European Union.

All necessary precautions shall therefore be taken in order to guarantee the maximum protection of personal data, basing the transfer: a) on adequacy decisions of the recipient third countries expressed by the European Commission; b) on adequate guarantees expressed by the third party recipient pursuant to Art. 46 of the Regulation; c) on the adoption of Binding Corporate Rules (BCRs).

### **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 applies), 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](mailto: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.