



POLITECNICO
MILANO 1863

**PRIVACY POLICY PURSUANT TO ART. 13 OF REGULATION (EU) NO 679/2016 OF 27
APRIL 2016**

This privacy policy is for candidates in public competitions for employment as technical and administrative staff at Politecnico di Milano, who use the platforms made available by Politecnico di Milano for sitting the tests in telematic mode.

Personal data collected/recorded for these purposes shall be processed in compliance with the provisions of Regulation (EU) 2016/679 (General Data Protection Regulation) and Italian Legislative Decree 196/2003 and subsequent amendments and additions (Personal Data Protection Code), as explained below.

Data Controller

Politecnico di Milano - General Director delegated by the pro-tempore Rector - contact: dirgen@polimi.it.

Data Processor

Dr Alessandra Moroni, Head of Human Resources and Organisation, Piazza Leonardo Da Vinci 32, Milan (MI) Italy - email alessandra.moroni@polimi.it.

Data Protection Officer

Email: privacy@polimi.it.

Specific purposes and modes of telematic processing

Personal data may be processed via the Teams and/or Zoom platforms, which enable the sit both written and oral competition tests, to be taken in the presence of members of the Selection Committee, other candidates and any external spectators who have made a legitimate request.

The competition tests shall take place in streaming mode and audio/video streams shall be recorded for as long as strictly needed.

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

Candidates shall be required to identify themselves via webcam in a breakout room that will simply be displayed in the video stream by the President of the Commission for verifying the identity of each candidate.

The provision of data is mandatory and failure to provide it will result in the inability to enter the competition.

Legal basis of the processing

The legal basis for the processing is in accordance with Article 6(1)(e) and Article 9(2)(g) of Regulation (EU) 2016/679. The processing of data falls within the institutional tasks entrusted to Politecnico di Milano and the telematic mode expressly envisaged as a means of carrying out the competition pursuant to the draft regulation amending Presidential Decree 487/1994 (Regulation on public competitions), in force as of 14 July 2023, and in particular Art. 7, paragraph 3: *"Oral tests shall be held in a classroom open to the public, of a capacity suitable to ensure maximum participation and, when this is not possible, the test may be held by videoconference, provided that technical solutions are adopted to ensure the identification of the participants, the regularity and integrity of the test, the security of communications and their traceability, in compliance with the legislation on the processing of personal data and, in any case, to ensure publicity of the test by digital means"*.

Moreover, the specific purposes of the processing are found in the second-level policies published on Politecnico di Milano's website: www.polimi.it/privacy/.

Retention period of personal data

Politecnico di Milano shall retain the data for the time strictly needed for the aforementioned purposes, subject to ten-year retention for ensuring fulfilment of the administrative steps required by law and subject, when needed, to longer terms that cannot be determined in advance, as a result of different conditions for lawful processing (e.g., legal proceedings that require processing for more than ten years). For competition tests only, retention is permanent.

Only for personal data that are entered into the information systems by means of audio video streams for data processing, the principles set out in Article 5 of Regulation (EU) 2016/679 apply, except in case of litigation, for a period of time not exceeding the achievement of the stated purposes and with specific regard to the principle of limitation of data retention set out in Article 5(e) of Regulation (EU) 2016/679.

Special categories of personal data

The data will only be processed by specifically authorised persons and by providers of online services or platforms who, for the sole purpose of the requested service, may come to know the personal data of the data subjects. Said authorised persons shall be expressly appointed as data Processors pursuant to Article 28 of Regulation (EU) 2016/679.

The data of data subjects may also be processed by system administrators expressly authorised by the Data Controller, in connection with the various ICT services for which they are responsible. You may be informed of the identity of system administrators and/or the updated list of Data Processors by writing to the above mentioned Data Controller.

Transfer of data abroad and data dissemination

Personal data shall be processed by the Data Controller within the European Union. Should it become necessary for technical and/or operational reasons to use entities located outside the European Union, or should it become necessary to transfer some of the collected data to technical systems and services managed in the Cloud and located outside the European Union, data processing shall be regulated in accordance with Chapter 5 of the Regulation and authorised on the basis of specific decisions by the European Union. All of the necessary precautions shall therefore be taken to ensure the maximum protection of personal data, basing the transfer on:

- a) adequacy decisions on recipient third countries made by the European Commission;
- b) appropriate guarantees provided by the recipient third party under Art. 46 of the EU Regulation;
- c) the adoption of Binding Corporate Rules (BCRs).

Rights of the data subject

Data subject have the rights set out in Sections 2, 3 and 4 of Chapter III of Regulation (EU) 2016/679. In particular, they have the right to request from the Data Controller: access to and rectification, erasure, restriction of the processing of their personal data, opposition to their processing and data portability. These rights can be exercised by contacting privacy@polimi.it.

If you believe that there has been a violation of your rights by the Data Controller and/or a third party, you have the right to lodge a complaint with the Data Protection Authority and/or other competent supervisory authority under the Regulation.

For additional information, especially on the processing of the personal data collected, please refer to the specific privacy policies of software and applications used to provide the service.

Milan, November 2023.