



POLITECNICO
MILANO 1863

INFORMATION ON DATA PROCESSING PURSUANT TO ARTICLE 13 OF REGULATION (EU) 2016/679

This privacy policy is issued pursuant to Art. 13 of Regulation (EU) 2016/679 (hereinafter the "EU Regulation") on the protection of natural persons with regard to the processing of personal data and compliance with the legislation on the processing of personal data and the free movement of such data. This privacy policy refers to the events organized by the Politecnico di Milano.

Data Controller identity and contact details

The Data Controller at Politecnico di Milano is the General Director, as appointed by the Rector - contact: dirgen@polimi.it

Internal Data Processor

The Directors or Department Managers in their capacity as Internal Data Processors of the university structures organizing the event.

The data shall also be processed by other persons authorised and instructed for this purpose in accordance with current legislation.

Data Protection Officer and contact points

E-mail: privacy@polimi.it

Purpose of data processing, legal basis, categories of data and retention period.

Personal data shall be processed for the following purposes:

- ✓ **Purpose 1:** registration and recording for participation in the event.
- ✓ **Purpose 2:** sending notices of future events, initiatives and organized activities.
- ✓ **Purpose 3:** communication of any food intolerances or allergies.

The data processed for **Purposes 1 and 2** described above are the following: personal data, identification data, contact data, photos and audio/video recordings. For **Purpose 3**, in the case of events involving catering services, particular data (health data) may be processed to notify of any food intolerances or allergies.

- ✓ The legal basis for **Purpose 1**, depending on the nature of the event, is public interest (Art. 6(1e) of the EU Regulation) or the consent of the data subject/participant (Art. 6(1a) of the EU Regulation). It is also specified that consent can be obtained by completing a specific registration form, or through the voluntary act of the data subject showing up at the event location and taking part.
- ✓ The legal basis for **Purpose 2** is identified in the consent of the data subject/participant (Art. 6(1a) of the EU Regulation).
- ✓ The legal basis for **Purpose 3** is identified in the consent of the data subject/participant (Art. 6(1a) of the EU Regulation).

We inform you that participants in the event may be subject to audio-video recordings. The data subject to processing, including images and audio/video recordings (hereinafter, the "Images"), even in partial and/or modified or adapted form, taken during the event shall be processed in full compliance with the GDPR.

The data shall be processed, including with the aid of electronic means, by specifically authorised persons, for the purposes of dissemination and communication by Politecnico di Milano. The images and audio/video recordings shall be processed according to the following Level 2 Privacy Policy relating to the processing of 'Multimedia Content': https://www.polimi.it/fileadmin/user_upload/Il-Politecnico/privacy/2023_03_06_contenuti_multimediali.pdf .



Nature of the data

The provision of data for Purpose 1 is necessary. Refusal to provide data will make it impossible to participate in the event.

The provision of data for Purposes 2 and 3 is optional. Refusal to provide the data prevents us from sending the required communications and prevents users from accessing the catering service.

Processing methods

Personal data shall be processed in hard copy, computerised and telematic forms and inputted to the relevant databases, which may be accessed by the persons appointed by the Data Controller as Internal Data Processors and other persons in charge of the processing of personal data; these persons may consult, use, process, compare data and perform any other appropriate operation, including automated operations, in compliance with the provisions of the law, necessary for guaranteeing, inter alia, the confidentiality and security of the data, as well as the accuracy, updating and relevance of the data to the stated purposes.

It should be noted that the events can take place in person or remotely, via video-conferencing platforms or even in hybrid mode, i.e. both in person and via videoconferencing platforms. More specifically, the events may include:

In-person events	In-person events take place at the Politecnico di Milano premises or organized by the university in external spaces.
Remote events	Online events take place via web platforms as described below.
Hybrid events	A hybrid event involves two separate, but simultaneous segments that take place within the event: one virtual (through web platforms) and the other in person.

If web platforms are used for the transmission of the event, please refer to the relevant privacy policy: By way of example only:

- ZOOM: <https://explore.zoom.us/en/privacy/>
- MICROSOFT TEAMS: <https://learn.microsoft.com/en-us/microsoftteams/teams-privacy>
- WEBEX: <https://help.webex.com/en-us/article/nv2hm53/Webex-Security-and-Privacy>

If a participant speaks with video or audio during the event, the speech will be recorded. Each participant who takes part in the event takes on responsibility and releases Politecnico di Milano from any liability for the diffusion of his/her image and/or audio during the event and afterwards.

Special categories of personal data

Pursuant to Art. 9(2a) of the EU Regulation, data that can be classified as “special categories of personal data” may be processed, in particular information relating to food intolerances and/or allergies in the case of events involving catering services.

Categories of recipients

The data processed for the above purposes shall be processed by persons duly authorised pursuant to Art. 29 of the EU Regulation. They will also be accessible to natural or legal persons who provide services to the Politecnico di Milano, even of a technical nature as in the case of audio/video recordings. In this case, these persons shall carry out the function of data processor pursuant to and for the purposes of Art. 28 of the Regulation.



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In any case, this is without prejudice to the disclosure of data requested, in accordance with the law, by the Public Security Authority, the Judicial Authority or other public entities for the purposes of defence, state security and investigation of crimes, as well as disclosure to the Judicial Authority in compliance with legal obligations, where a crime is identified.

Outside of the aforementioned cases, personal data are not disseminated or disclosed to third parties in any way or for any reason.

Data retention period

For Purposes 1 and 3, personal data shall be retained for the time strictly necessary for organising and holding the event.

For Purpose 2, the data shall be retained for a period of 5 years.

Transfer of data to non-EU countries or international organisations

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 expressed 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*.

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 rectification of inaccurate data or the completion of incomplete data; the deletion of personal data concerning you (where any of the conditions indicated in Art. 17(1) of the Regulation apply 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(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.

These rights can be exercised by contacting 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 (in Italy, www.garanteprivacy.it) and/or other competent supervisory authority pursuant to the Regulation.