**INFORMATION ON DATA COLLECTION AND PROCESSING IN ACCORDANCE WITH ART. 13 OF REGULATION (EU) NO 679/2016 OF 27 APRIL 2016**

This Statement is issued under 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 law on the processing of personal data and the free movement of such data.

In particular, this information refers to taking charge, educational and technical support for carrying out entrance tests and/or exams, reporting of students' disability and/or SLD conditions on the teacher register, assignment of residences within the limit of places managed by Multichance, placement aimed at protected categories and conservation of the data in the archive.

**Data Controller**

Politecnico di Milano - General Director delegated by the pro-tempore Rector - contact: [dirgen@polimi.it](mailto:dirgen@polimi.it).

# **Internal Data Processor**

Chiara Pesenti, Campus Life Division manager, Building 3, Piazza Leonardo da Vinci, 32 - 20133 Milan [chiara.pesenti@polimi.it](mailto:chiara.pesenti@polimi.it)

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](mailto:privacy@polmi.it) - Tel. 02 23999378.

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

The data processing takes place exclusively for the institutional purposes of public interest provided for by the laws containing provisions regarding the educational programme, in compliance with the principles of lawfulness, correctness, transparency, adequacy, relevance and necessity pursuant to Art. 5 of Regulation (EU) No 679/2016.

The legal basis of the processing is:

* for common and contact data, **Art. 6, paragraph 1, letter e) of Regulation (EU) No 679/2016;**
* for particular data potentially required during the student's career, **Art. 9, paragraph 2, letter g)** “*Processing of particular categories of data*" **of Regulation (EU) No 679/2016;** **art. 2 sexies, paragraph 2, letter bb)** **of the Italian Legislative Decree No 196/2003** “*Processing of special categories of personal data necessary for reasons of important public interest*”; **Art. 13 of Italian Law No 104/1992** "*School integration*”; **Art. 16, paragraph 5 of Italian Law No 104/1992** “*Performance evaluation and exams*”; **Art. 2 paragraph 3 of Italian Ministerial Decree No 5669/2011** "*Identification of students with SLDs*”**;** **Guidelines for the right to study of pupils and students with specific learning disabilities,** attached to Italian Ministerial Decree No 5669 of 12 July 2011.

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| Intended purpose of personal data processing | Categories of personal data subject to processing | Retention period of personal data |
| Purpose 1  Taking charge, educational and technical support for the provision of entrance tests and the educational programme. | * Personal details * Contact details * Tax Code * Data relating to university career * Disability or SLD status | The data will be retained indefinitely  due to the obligations of transparency and good functioning of the public administration. |
| Purpose 2  Teaching support from lecturers in charge of the specific teaching. | * Disability or SLD status | The data will be retained indefinitely  due to the obligations of transparency and good functioning of the public administration. |
| Purpose 3  Placement aimed at protected categories. | * Personal details * Contact details * Tax Code * Data relating to university career * Disability or SLD status | Personal data, contact details, tax code and university career data will be retained indefinitely.  Health data will be retained for 24 months after graduation. |
| Purpose 4  Assignment of residences within the limit of places managed by Multichance. | * Personal details * Contact details * Tax Code * Disability or SLD status | The data shall be kept for the duration of the period living in the accommodation and subsequently, for the period for which the Politecnico di Milano is obliged to retain them for tax purposes or for other purposes required by law or according to the Regulation. |

# **Nature of the data**

The provision of data is mandatory. Refusal to provide the data prevents the person from accessing the services offered by Multichance.

# **Processing methods**

# The requested data may be collected both on paper and digital media, manually and/or with electronic or, in any case, automated tools and will be collected following an organizational and processing logic strictly related to the purpose indicated and in any case in such a way as to guarantee the security, integrity and confidentiality of the data.

# Access to the data acquired for Purpose 1 outlined in the table is only permitted to duly authorised personnel.

**Special categories of data**

For the purposes referred to in this information, personal data relating to the health condition belonging to the categories referred to in Art. 9 of the Regulation (EU) shall be processed. The data in question shall be processed in order to enable the data subject to:

* manage his/her academic career;
* use the support service by the Equal Opportunities Unit - Multichance area of Politecnico di Milano based on the needs stated;
* have teaching support from teachers;
* be assigned residences within the limit of places managed by Multichance;
* access the placement of protected categories.

# **Categories of recipients**

In relation to the purposes indicated, personal data may be disclosed to the following public and/or private entities, or may be disclosed to companies and/or persons who provide services, including externally, on behalf of the Data Controller.

In particular, the data collected may be transmitted to providers of student support services (placements, residences or others that may be necessary). Politecnico di Milano will formally appoint these parties as ‘External data processors according to Art. 28’. Furthermore, the data collected may be transferred to third party recipients as sponsors of the services provided to students or for their own purposes as part of specific initiatives. Finally, your personal data may also be disclosed to other public administrations, including in anonymous form in the event that such administrations are obliged to process this 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 the provisions of European system, laws or regulations, as well as insurance bodies for any accident reports.

In particular, the data relating to the health condition may be transferred to the lecturer of the exam that the student will have to take, limited only to the specification of the student's SLD condition, with the main aim of allowing him/her to improve his/her teaching.

Specifically, the following parties are recognised as the recipients of your personal data:

* professors, limited to the student's SLD condition (subjects authorized to process, pursuant to the Privacy Organizational Model of Politecnico di Milano);
* companies, through the competent University Service, for the placement of protected categories;
* residences affiliated with Politecnico;
* companies or external bodies, with the aim of offering support services to the student.

# **Transfer 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 third country recipients as expressed by the European Commission;  
b) appropriate safeguards provided by the third party recipient under Article 46 of the Regulation;  
c) the adoption of binding corporate rules *Binding Corporate Rules*.

**Data Subjects’ rights**

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, paragraph 1 of the Regulation applied); 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 the Data Controller and/or a third party have violated your rights, you may lodge a complaint with the Data Protection Authority and/or other competent supervisory authority under the Regulation.

Milan, 02 August 2024.