



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

The current information is issued pursuant to Art. 13 of Regulation (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and in compliance with the legislation on personal data processing, as well as the free circulation of such data.

Data controller

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

Internal data processor

Dr Chiara Bianca Pesenti, Campus Life Division Manager, Piazza Leonardo da Vinci 32, Milan (MI), tel. +39 02.2399.2428, e-mail: chiara.pesenti@polimi.it

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

Data Protection Officer and contact details

Dr Vincenzo Del Core - privacy@polimi.it tel .: +39 02 23999378.

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

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

Intended purpose of the personal data processing	Legal basis of the processing	Categories of personal data subject to processing	Retention period of personal data
Purpose 1: the data provided shall be processed for the assignment and management of accommodation in university-owned residences on the free market.	Performance of the contract to which the data subject is party (Article 6, paragraph 1b of the Regulation)	<ul style="list-style-type: none"> • Identifying data • Personal details • Tax information • Bank details • Health details (conditions of disability); 	The data shall be kept for the duration of the contract 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.
Purpose 2 : the data provided shall be processed for the assignment and management of accommodation in university-owned residences as a service relating to University Financial Aid (Diritto allo Studio Universitario, DSU).	Performance of a task carried out in the public interest by the Politecnico di Milano (Article 6, paragraph 1e of the Regulation)	<ul style="list-style-type: none"> • Identifying data • Personal details • Tax information • Bank details • Health details (conditions of disability). 	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.



<p>Purpose 3: the data provided shall be processed in order to send university messages on the services offered by the Housing & Dining Unit via WhatsApp Business - broadcast lists.</p>	<p>Performance of a task carried out in the public interest by the Politecnico di Milano (Article 6, paragraph 1e of the Regulation)</p>	<ul style="list-style-type: none"> • Identifying data • Personal details • Contact details • Student residence data 	<p>The data shall be kept for a maximum of 12 months, i.e. the period of time living in the university residence.</p>
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Nature of the data

The provision of data is optional. Refusal to provide the data prevents us from pursuing the the intended purposes.

Special categories of data

In specific cases, we may process personal data belonging to special categories pursuant to Art. 9 of the Regulation such as:

- data concerning health, in case of pregnancy or for students/employees/collaborators with disabilities. For the purposes of identifying and subsequently assigning the accommodation, in the case of persons with disabilities, data concerning the type and degree of disability shall be processed by duly authorized personnel;
- data revealing religious beliefs and data revealing racial or ethnic origin. During the period living in the residence, we may become aware accidentally of information related to religious beliefs and ethnicity, used exclusively to satisfy cultural mediation opportunities and to ensure optimal living conditions in the residence.

These data are processed, within the limits of the purposes shown in the TABLE, to allow the data subject:

- the use of the service provided by the Politecnico di Milano on the basis of their declared needs;

Processing methods

The processing carried out for the purposes described above can be carried out both on paper and digitally, manually and/or using electronic or, in any case, automated tools. They are also stored in paper archives and in digital format 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.

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

With regard to Purpose 3, the aforementioned messages shall be sent through the Whatsapp Business instant messaging system using the broadcast list function which allows you to send an identical message containing simple text or a multimedia element to multiple contacts at the same time, and in a single chat. The broadcast message shall appear as a single message sent by the Politecnico di Milano and the contacts on the list shall not be able to read the messages or the replies of the other contacts and, in the same way, own replies shall remain confidential. The messages sent may contain texts, images, videos and links to the full article/information. Users can also choose to receive the message in Italian or English. The message can be customized based on the user profile. The data provided shall be used solely to manage the information service. The service is provided through the WhatsApp platform. [Please refer to the WhatsApp Privacy Policy.](#)



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Personal data shall be processed in computerized form by personnel duly authorized to manage the channel.

For the purposes of correct and transparent data processing, data subjects are informed that the registration data for the messaging service via Whatsapp shall be profiled to identify the category (e.g. student and/or professor) and/or residence to which they belong. This is a non-automated profiling process, but adopted exclusively in order to ensure communication is appropriate to the role of the individual data subject. In this case, we shall ask for express consent. Without consent, we shall be unable to customize communications according to the category of the data subject.

Categories of recipients

The data processed for the purposes outlined above shall be disclosed or shall in any case be accessible to employees and collaborators assigned to the relevant departments at the Politecnico di Milano, who, as authorized data processors, shall be duly and adequately instructed by the Data Controller.

In relation to the purposes indicated, personal data may be disclosed to the categories of public and/or private entities, or may be disclosed to companies, both in Italy and abroad, that provide services, including externally, on behalf of the Data Controller, where necessary appointed as data processors. Specifically, your personal data may also be disclosed to other public administrations, even in anonymous or aggregate form, in the event that such administrations are obliged to process these data for any proceedings of own institutional competence, as well as to all public entities to which, under the relevant conditions, disclosure is legally required under the provisions of the European system, laws or regulations, as well as insurance bodies for any accident reports.

In particular, the personal data processed shall be transmitted to the following third parties, by way of example and not limited to:

- the Police;
- the Residence Management Service;
- the company that provides the reservation software.

Transfer to non-EU countries and/or international organizations

Personal data may be transferred abroad, in accordance with the provisions of the Regulation, even to countries outside of the European Union and/or to international organizations, when this is necessary for one of the purposes indicated in this privacy policy. The transfer to non-EU countries and/or to international organizations, in addition to cases in which this is safeguarded by adequacy decisions by the European Commission, is performed in such a way as to provide appropriate safeguards pursuant to Articles 46 or 47 or 49 of the Regulation.

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:



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- 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.

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.

Traduttore : Walling

Revisore : Lombardi



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