

## Specific information notice on the processing of personal data for education and training purposes

The **Consortium POLIEDRA - Centro di servizio e consulenza del Politecnico di Milano su pianificazione ambientale e territoriale** with registered office in Milan, Piazza L. Da Vinci 32 20133 and operational headquarters in Milan, Via Giuseppe Colombo 40, 20133, C.F. - VAT number 12903700156, is the Data Controller of personal data ("POLIEDRA", or also "Data Controller").

### 1. Data controller

The Data Controller is the **Consortium POLIEDRA - Centro di servizio e consulenza del Politecnico di Milano su pianificazione ambientale e territoriale**, with registered office in Milan, Piazza Leonardo da Vinci, 32, 20133 Milan and operational headquarters in Milan, via Giuseppe Colombo, 40, 20133 Milan.

The Data Controller releases the information notice to indicate in a transparent and easily accessible way the categories of Data Subjects, the type of data and processing performed, the purposes underlying the processing, the security measures taken and the third parties to whom the data may be communicated.

The Data Controller, pursuant to art. 13 of the EU Regulation n. 2016/679, will process the data of Data Subjects when necessary only for education and training purposes, using the methods indicated below.

Personal data processing means any operation or set of operations, carried out with or without the aid of automated processes and applied to personal data, even if not registered in a database, such as the collection, recording, organization, structuring, storage, processing, selection, blocking, adaptation or modification, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, elimination or destruction.

The data will be processed for the purposes referred to in paragraph 2 below, manually and/or through the support of IT or electronic means.

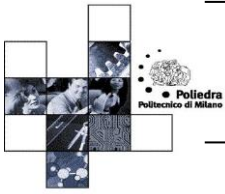
The Data Controller, moreover, pursuant to art. 37 of EU Regulation no. 2016/679, has designated a Data Protection Officer ("DPO"), available at the email address [dpo-poliedra@polimi.it](mailto:dpo-poliedra@polimi.it).

For any other form of communication, not covered by those for which the DPO has been designated, the Data Controller provides the email address: [privacy-poliedra@polimi.it](mailto:privacy-poliedra@polimi.it).

### 2. Main purpose of personal data processing

The personal data collected will be processed for education and training purposes, where education and training means: Masters and Postgraduate Courses of the Politecnico di Milano, jointly and in collaboration with other bodies, institutions, schools and more, advanced training courses, on demand education and training, workshops, coaching for companies, bodies, associations and institutions, education and training events, seminars and more.

In order to ensure an informed consent to the processing by the Data Subjects, it is specified that the purpose in question cannot be achieved without the necessary presentation of an application for admission, an application form or a similar "registration" document or, for legal companies, without signing a "contract" with POLIEDRA.



### 3. Data communication and dissemination

The personal data of Data Subject obtained by "registration" and/or "contract" (see above) may be disclosed to third parties for the provision of education and training activities, however within the limit of the purposes of the processing described above.

No personal data acquired through "registration" and/or "contract" will be disseminated in violation of law.

### 4. Category of collected data

POLIEDRA only processes the personal data of the Data Subject collected by an application for admission, an application form or similar registration document and by any other document (curriculum vitae, copy of the identity document, copy of the passport, ...) specifically requested by each educational and training activity.

In case the service is addressed to a legal entity, POLIEDRA exclusively processes the company data, the name and surname of the person being authorized to sign the private agreement and the contact personal data of the person(s) of the company who deals with the activities mentioned in the appointment.

### 5. Processing methods

The personal data are processed with automated tools for the time strictly necessary to achieve the purposes for which they were collected. If it is necessary the Data Controller will formally request the Data Subject for an extension. In order to prevent data loss, abuse, incorrect data use and unauthorized access, specific security measures have been implemented, as required by law. Finally, the processing of personal data is only handled by the staff in charge of processing by the Data controller.

The processing will be carried out in the following ways: paper supports, magnetic supports, manually and/or electronically or, in any case, automated. Personal data will be stored both in a physical file in POLIEDRA and in the consortium server, to follow up the purposes and activities indicated in this information notice.

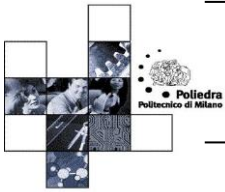
Personal data will be processed only for the purposes referred to in paragraph 2 above; if POLIEDRA intends to use the same data for further purposes, it must do so with explicit consent from the Data Subject. The processing of personal data may be carried out on behalf of POLIEDRA, with the aforementioned methods and criteria of confidentiality, equivalent security, by companies and bodies that provide specific processing services regarding the management of services reserved for students or administrative services, as well as by public or private organizations carrying out orientation and placement activities, providing internships or implementing cooperation and exchange programmes with European and non-EU universities or carrying out activities that fall within the aforementioned purposes.

Personal data will be transmitted to companies, firms, organizations and institutions for the planning and implementation of curricular internship programmes.

In the event that the companies, firms, organizations and institutions transmit to the Data Controller:

- offers and opportunities to enter the world of work
- extra-curricular internships or training and/or orientation traineeships

POLIEDRA will limit itself to merely transmitting the job description or similar document/text to the Data Subject, who must apply personally for the aforementioned job. In such cases, POLIEDRA is not responsible for the processing of data carried out by the applicant companies, firms, organizations and institutions.



## 6. Storage time

The storage time of a data item, which has been formalised in documents such as the information notice to be released to the Data Subject or in the register of processing activities, is linked to the purpose of the processing. POLIEDRA reserves the right to store personal data for up to 60 months from the end of the education and training activity and/or contract, also taking into account any filing obligations required by law.

Actually, the same data, if used for different purposes, could have different storage times, which must therefore be appropriately managed and communicated to the Data Subjects.

The times are divided into times for the purpose, which end when the purpose for which it was provided is achieved, and storage times, for which there must be a reason. In some situations, the Data Controller may decide to extend the storage times beyond those required by law.

## 7. Rights of the Data Subject

The Data Subject has the rights referred to in art. 15 of EU Regulation no. 2016/679 and specifically the rights listed below:

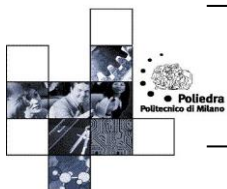
- to obtain confirmation from the Data Controller of the existence or not of personal data, even if not yet registered;
- to obtain information on: a) the source of personal data; b) of the purposes and methods of the processing; c) the logic applied in case of processing carried out with the aid of electronic instruments; d) the identification details of the Data Controller, of the officers and of the other persons charged with the task;
- to obtain: a) the updating, rectification or integration of data; b) the cancellation, transformation into anonymous form or blocking of unlawfully processed data, including those that do not need to be kept for the purposes for which they were collected; c) the certification that the operations referred to in subparagraph a) and b) were made known, including their contents, to those to whom the data were communicated or disclosed, except when this is impossible or involves a commitment of resources clearly disproportionate;
- to object, in whole or in part: a) for legitimate reasons, to the processing of personal data even if pertinent to the purpose of the collection; b) to the processing of personal data for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication through the use of traditional marketing systems, or automated calls, by email, telephone and/or paper mail.

The Data Subject also has the rights referred to in articles 16-21 of the EU Regulation no. 2016/679, i.e. the right to rectification, the right to be forgotten, the right to limit processing, the right to data portability, as well as the right to complain to the Data Protection Authority.

The Data Subject may, at any time, exercise his/her rights by sending a request to the Data Controller by:

- registered letter with return receipt to POLIEDRA, at the operational headquarters in Milan, Via Giuseppe Colombo 40, 20133 Milan; or
- email to the address: [privacy-poliedra@polimi.it](mailto:privacy-poliedra@polimi.it)

or the Data Subject can choose to assert his/her rights before the Data Protection Authority and/or the Judicial Authority.



## 8. Consent

Pursuant to EU Regulation no. 2016/679, the Data Subject consent to the processing of data for this purpose is considered necessary. Without this consent, POLIEDRA will not be able to proceed with the relation.

The consent is deemed granted when the Data Subject signs at the bottom of the application for admission, the application form or a similar "registration" document or, for legal companies, the "contract" with POLIEDRA.

## 9. Changes to the Privacy Notice

The Data Controller reserves the right to modify, update, add or remove portions of this privacy information notice at its discretion and at any time. In order to facilitate this verification, the information notice will contain the indication of the update date.

*Last update: March 11, 2019*