**PRIVACY POLICY ON DATA PROCESSING PURSUANT TO ART. 13 OF EU REGULATION**

**N. 679/2016 OF 27 APRIL 2016**

# This privacy policy is issued pursuant to Article 13 of EU Regulation 2016/679 of 27 April 2016 (hereinafter referred to as the EU Regulation), concerning the protection of natural persons with regard to the processing of personal data and in compliance with the legislation on the processing of personal data, as well as the free movement of such data.

# In particular, this Information notice refers to the mandatory admission tests for the Bachelor's degree courses at the Politecnico di Milano.

# **Data Controller**

# Politecnico di Milano, General Director on behalf of the acting Rector, contact: [dirgen@polimi.it](mailto:dirgen@polimi.it) .

# **Internal Data Processing Manager**

# Dr. Assunta Marrese, Head of the Didactic Area, email: assunta.marrese@polimi.it.

# The data will be processed by other authorized subjects and for this purpose instructed in compliance with the current legislation.

# **Data Protection Officer**

Mail: [privacy@polimi.it](mailto:privacy@polmi.it) .

**Purpose of Processing, legal basis, categories of data, and retention period**

For the purposes of applying European and national legislation on the protection of personal data, with particular reference to EU Regulation n. 679/2016 (hereinafter referred to as the EU Regulation) and Legislative Decree n. 196/2003 and subsequent amendments, it is informed that personal data will 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  Registration for the mandatory admission test for access to the Bachelor's degree courses at the Politecnico di Milano. | Public interest  (art. 6, para. 1, letter e) and art. 9, para. 2, letter g) of the EU Regulation). | * Identifying data * Contact details * Personal details * Disability/DSA | 5 years.  A longer period may be provided in case of disputes and/or litigation. |
| Purpose 2 Conducting the mandatory admission test for the Bachelor's degree courses at the Politecnico di Milano. | Public interest  (art. 6, para. 1, letter e) and art. 9, para. 2, letter g) of the EU Regulation). | * Identifying data * Contact details * Personal details * Photos and audio/video recordings. * Disability/DSA | Images and audio/video recordings will be retained for a period of 90 days from the date of the test. Other categories of collected data will be retained for a period of 5 years. A longer period may be provided in case of disputes and/or litigation. |
| Purpose 3 Statistical analysis and surveys, historical research, and archival preservation. | Public interest  (art. 6, para. 1, letter e) and art. 9, para. 2, letter g) of the EU Regulation). | * Identifying data * Contact details * Personal details * Disability/DSA | Unlimited retention time, in accordance with the archival obligations dictated by current legislation. |

# It is communicated that with particular reference to Purpose No. 2, the data subject may be subject to audio-video recordings.

# The data subject to processing, including images, video recordings, and audio recordings (hereinafter referred to as "Images"), even in partial and/or modified or adapted form, are made during the admission test and will be processed in full compliance with EU Regulation No. 679/2016.

# The data will be processed, also with the aid of electronic means, by subjects specifically appointed by the Data Controller, for identity verification and monitoring activities during the test phases.

# The collected Images will be stored electronically and on any technological support for the purposes and within the limits defined above.

# The use of images does not entitle to any compensation.

# In any case, pursuant to Article 10 of the Civil Code, any use of the Images that may harm the honor, reputation, or decorum of the person portrayed, filmed, or recorded is excluded.

**Nature of Data**

The provision of the requested data for the purposes expressed in the table is optional. However, in the absence of the requested data, the mandatory admission test cannot be carried out.

**Processing Methods**

The processing of data for the above purposes can be carried out both on paper and digitally, manually and/or with electronic tools.

The Politecnico di Milano uses videoconferencing platforms that, thanks to the activity provided by authorized personnel, ensure the authenticity of the test taken.

In particular, the processing for Purpose 2 indicated above is carried out on digital support, with electronic tools, including the videoconferencing platform ZOOM (<https://www.zoom.com/it> ) and/or Microsoft Teams (<https://www.microsoft.com/it-it/privacy/privacystatement> ).

It is also specified that the results of the admission tests will be processed for purposes related to the student's career, whose properties and processing methods are explained in the 2nd level Didactic and Career Information Notice, published at the following link:

<https://www.polimi.it/fileadmin/user_upload/Il-Politecnico/privacy/Informativa_2livello_Didattica_e_carriera_studenti_-_Aggiornamento_ottobre_2024_-_ITA.pdf> .

Furthermore, within the scope of Purposes 1 and 2 expressed, it is communicated that data transmitted to the Politecnico di Milano by third parties (e.g., other universities) necessary for the correct conduct of the admission procedures may be processed.

**Special Categories of Data**

For Purposes 1 and 2, the processing of personal data belonging to special categories as defined by Art. 9 of the EU Regulation is provided, specifically:

* Health data (disability and DSA conditions).

The data in question are processed to allow the data subject:

* The conduct of the mandatory admission test in a supported mode (e.g., additional time, reader, etc.).

**Categories of Recipients**

In relation to the indicated purpose, the data may be communicated to the following public and/or private subjects, or may be communicated to companies and/or persons providing services, including external ones, on behalf of the Data Controller.

Furthermore, personal data may also be communicated to other public administrations, even in anonymous form, if they need to process them for any proceedings within their institutional competence, as well as to all those public subjects to whom, in the presence of the relevant conditions, communication is mandatory by European regulations, laws, or regulations.

Specifically, the data may be shared with CISIA, as an independent Data Controller, within the scope of shared admission tests.

The data relating to the payment of the contribution for the conduct of the admission tests are reported to the Revenue Agency, in compliance with legal obligations.

**Transfer to Non-EU Countries or International Organizations**

Personal data will be processed by the Data Controller within the territory of the European Union.

If, for technical and/or operational reasons, it becomes necessary to use subjects located outside the European Union, or it becomes necessary to transfer some of the collected data to technical systems and services managed in the cloud and located outside the European Union area, the processing will be regulated in accordance with the provisions of Chapter V of the EU Regulation and authorized based on specific decisions of the European Union.

All necessary precautions will therefore be adopted to ensure the total protection of personal data, basing the transfer:

a) on adequacy decisions of the recipient third countries expressed by the European Commission; b) on adequate guarantees expressed by the third-party recipient pursuant to Art. 46 of the EU Regulation; c) on the adoption of binding corporate rules, so-called Corporate binding rules.

**Rights of Data Subjects**

As a data subject, you can request at any time from the Data Controller:

* confirmation of the existence or otherwise of personal data concerning you;
* access to your personal data and information relating to them; rectification of inaccurate data or integration of incomplete data; deletion of personal data concerning you (upon the occurrence of one of the conditions indicated in Art. 17, paragraph 1 of the Regulation and in compliance with the exceptions provided for in paragraph 3 of the same article); limitation of the processing of your personal data (upon the occurrence of one of the hypotheses indicated in Art. 18, paragraph 1 of the Regulation), transformation into anonymous form or blocking of data processed in violation of the law, including those for which retention is not necessary in relation to 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 mail to: [privacy@polimi.it](mailto:privacy@polimi.it).

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

Milan, February 2025.

*This privacy notice has been translated into english with the support of AI tools. The official and legally binding version is the italian text. In case of discrepancies, the italian version shall prevail.*