



## SECOND LEVEL PRIVACY POLICY FOR PERSONAL DATA PROCESSING IN LIBRARIES

This policy is issued under art. 13 of EU Regulation 2016/679 of 27 April 2016 on the protection of individuals during personal data processing, under the personal data processing legislation and the free movement of data.

### Data Controller

The Politecnico di Milano Data Controller is the Director General delegated by the Pro-tempore Rector - contact: [dirgen@polimi.it](mailto:dirgen@polimi.it).

### Internal Data Processor

Dr Chiara Pesenti – Piazza Leonardo da Vinci, 32 Milan (MI) e-mail: [chiara.pesenti@polimi.it](mailto:chiara.pesenti@polimi.it).  
Personal data will be processed by additional authorised parties who will receive instructions for that purpose in compliance with applicable legislation.

### Data protection officer and contacts

Dr Vincenzo Del Core - [privacy@polimi.it](mailto:privacy@polimi.it) Ph.: 0223999378

### Purposes and legal basis of the data processing, categories of data and data retention period

Under the relevant European and national legislation (EU Reg. 679/2016, hereafter Regulation), we inform you that your personal data will be used for the following purposes:

Personal data processing purposes	Processing legal basis	Categories of personal data processed	Data retention period
<b>Purpose 1:</b> providing lending services to internal users. Lending services include home lending, on-site consultation services, inter-system and interlibrary lending, Document Delivery, purchase suggestion, and Reference services.	Fulfilling the Politecnico di Milano institutional role (Art. 6, paragraph 1, letter e) of the EU Regulation).	<ul style="list-style-type: none"><li>• Personal details (name and surname, date and place of birth, tax code, residence);</li><li>• Contact details (email address, telephone numbers);</li><li>• Career details.</li></ul> The data processed is automatically stored in the University's register and integrated into library	The data collected will be stored for ten years.



		management software. The university personnel and student data is collected when they start their relationship with Politecnico.	
<b>Purpose 2:</b> providing lending services to occasional external users. Lending services include home lending, on-site consultation services, inter-system and interlibrary lending, Document Delivery, and Reference services.	Fulfilling the Politecnico di Milano institutional role (Art. 6, paragraph 1, letter e) of the EU Regulation).	<ul style="list-style-type: none"><li>• Personal details (name and surname, date and place of birth, tax code, residence);</li><li>• Contact details (email address, telephone numbers).</li></ul> The data processed is automatically stored in the University's register and integrated into library management software. The data collection takes place when an external user asks to use library services.	The data collected will be stored for ten years.
<b>Purpose 3:</b> Compiling reports and statistics on lending services.	Fulfilling the Politecnico di Milano institutional role (Art. 6, paragraph 1, letter e) of the EU Regulation).	<ul style="list-style-type: none"><li>• Personal and career data, lending transactions carried out (identifying elements of the bibliographic materials, lending start and end date, and sanctions).</li></ul>	The data collected will be stored for ten years.
<b>Purpose 4:</b> access detection in libraries and statistical purposes	Fulfilling the Politecnico di Milano	<ul style="list-style-type: none"><li>• Personal and career data, access times and library stay</li></ul>	The data collected will be stored for ten years.



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	institutional role (Art. 6, paragraph 1, letter e) of the EU Regulation).		
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### Nature of data

The provision of data for these purposes is optional. However, refusal to provide the data will make it impossible to use the services provided by the Politecnico di Milano libraries.

### Processing Methods

Processing for the above-mentioned purposes can be carried out on paper and digitally, manually or using electronic or automated tools, including *in-house databases* and Data Management Unified databases (Anagrafica Unica) and SebinaNEXT. The data is stored in paper archives for the processing duration and in digital format indefinitely under the obligations of transparency and proper functioning of the public administration.

Access to data acquired for purposes 1, 2, 3, 4 is permitted for authorised personnel only.

The e-mail addresses and mobile phone numbers are used to contact data subjects and send automatic communications and SMSs to provide communications strictly related to the library service's performance.

The messages and communications sent by the library through the above tools include:

- lending term expiry notices
- availability of documents (books) ordered by the user
- availability of documents (books or articles) requested by the user in intra-university, interlibrary or document delivery;
- availability of books which the user wishes to buy

The existing legislation on personal data protection and personal data electronic processing and, particularly, the indications of the Data Protection Supervisory Authority on the use of short text messages by public entities allow the latter to send SMSs for institutional communications as part of their duties, without requesting the provision of consent, and only for purposes related to a specific request or indication of the data subject.

### Categories of Recipients

For purposes 1 and 2 the data may be communicated to the following public or private entities, or they may be communicated to companies or persons, in Italy and abroad, that provide services, even external, on behalf of the Controller for the provision of lending services and for the management of automation software: CAeB - Cooperativa Archivistica e Bibliotecaria and Data Management which were appointed as External Data Processors.

Personal data may also be communicated to other public administrations, even anonymously if the latter need to process such data for purposes within their institutional remit, as well as to all those public entities to which (if the necessary preconditions are met) the communication of personal data is required mandatorily by EU rules, laws or regulations, and to insurance companies when accident files are opened.

### Transfer to non-EU countries

The personal data may be transferred abroad, in accordance with the Regulation, even to countries outside the European Union, when this is necessary for one of the purposes set out in this privacy policy. The transfer to



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non-EU countries, in addition to cases where this is guaranteed by adequacy decisions of the European Commission, is carried out in such a way as to provide suitable and appropriate safeguards under Articles 46 or 47 or 49 of the Regulation.

## Data subject rights

The data subject, in relation to the personal data subject to this privacy policy, may exercise the rights envisaged by EU Regulation indicated below:

- Data subject access right [art. 15 of EU Regulation] (the possibility of being informed of processing carried out on Personal Data and receive a copy);
- right to rectify Personal Data [Art. 16 of EU Regulation] (the data subject has the right to rectify inaccurate personal data);
- right to erasure of Personal Data without undue delay (“right to be forgotten”) [Art. 17 of EU Regulation] (the data subject has the right to the erasure of personal data);
- right to restriction of processing of Personal Data in the cases envisaged by Art. 18 of EU Regulation, including in the case of unlawful processing or where the accuracy of the personal data is contested by the data subject [Art. 18 of EU Regulation];
  
- data portability right [art. 20 of EU Regulation], the data subject may request their Personal Data in a structured format to transmit it to another data controller, in the cases provided for in the same article;
- right to object to the processing of Personal Data [Art. 21 of EU Regulation] (the data subject has, and will have, the right to object to the processing of their personal data);
- right not to be subject to a decision based solely on automated processing [Art. 22 of EU Regulation] (the data subject has, and will have, the right not to be subject to a decision based solely on automated processing).

Further information on data subject rights may be obtained on the website [www.garanteprivacy.it](http://www.garanteprivacy.it).

Politecnico di Milano, under Art. 19 of EU Regulation, informs recipients to whom the personal data have been communicated of any requested rectifications, erasures, or restrictions of the processing, if this is possible.

With reference to the above purposes, the data subject has the right to withdraw, at any time, the consent to processing of identification and personal data by sending an email to: [privacy@polimi.it](mailto:privacy@polimi.it).

### **Right to lodge a complaint**

If the data subject believes that their rights have been compromised, they have the right to lodge a complaint with the Data Protection Supervisory Authority, by following the instructions indicated by that Authority at the following internet address [www.garanteprivacy.it](http://www.garanteprivacy.it).