



INFORMATION ON THE COLLECTION AND PROCESSING OF DATA FOR PARTICIPATION IN THE EASTER/SUMMER CENTRE OF THE POLITECNICO DI MILANO

This privacy policy is issued pursuant to 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 legislation on the processing of personal data, as well as the free movement of such data.

Data Controller

The data controller of Politecnico di Milano is the Director General, as appointed by the Rector - contact: 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

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

Data Protection Officer and contact details

Email: 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 (Regulation (EU) 679/2016, hereinafter "Regulation"), we inform you that your personal data, and those of your child, shall be used for the following purposes:

Purpose of the processing	Legal basis of the processing	Categories of personal data subject to processing	Retention period
<p>Purpose 1 Participation of minors in the Easter/summer camps organized by the Politecnico di Milano.</p>	<p>Consent (Article 6(1)(a) and Article 9 of the EU Regulation).</p>	<ul style="list-style-type: none"> • Personal data of the parents and the child; • Contact details; • Tax information; • Health data (disabilities and allergies/specific diets) of the child. 	<p>10 years</p>
<p>Purpose 2 Processing and use of multimedia content that can be published on the University website and institutional communication channels, in order to promote the activities carried out in Polimi easter and summer camps.</p>	<p>Consent (Article 6(1)a of the EU Regulation).</p>	<ul style="list-style-type: none"> • Images and audio/video recordings of minors 	<p>5 years</p>

With reference to purpose no. 2, we inform you that photos and videos may be taken of children attending the Politecnico di Milano easter and summer camps. To this end, explicit consent will be requested from

the child's parents or the person exercising parental authority, as well as the signing of a specific release form for the use of images.

The images and videos produced, even in partial and/or modified or adapted form, will be processed in full compliance with EU regulations, filming minors from behind where permitted and **adopting all measures necessary to prevent their direct identification (for example, but not limited to, no close-up photos or filming; use of blurring; etc.).**

The images collected may be disseminated in accordance with Law No. 150/2000 on the institutional websites of the Politecnico di Milano, as well as through the University's social media channels (Facebook, Twitter, YouTube, by way of example but not limited to).

The use of the images and videos does not entitle to any compensation.

With this authorisation, the signatory grants a non-exclusive license to use the materials, transferable to third parties and without duration or geographical limits. This includes the rights referred to in Articles 12 to 19 of the Italian Law No 633 of 22 April 1941, including but not limited to: right of publication; right of reproduction in any manner or form; right of transcription, editing, adaptation, processing and reduction; right of disclosure and distribution to the public, including the rights of projection, transmission and dissemination including in summarised and/or abridged version, by any technical means; right to keep a copy of the materials, including in electronic form and on any known technological support or future invention for the purposes and within the limits defined above.

In any case, any use of any images or videos that may prejudice the honour, reputation or decorum of the person portrayed, filmed or recorded is excluded pursuant to the aforementioned article and pursuant to Article 10 of the Italian Civil Code.

Nature of the data

The provision of data for purpose 1 is mandatory. Refusal to provide the data will result in the inability to access the Polimi easter and summer camps.

Processing methods

The required data will be collected by means of a mandatory application form and used with manual and/or digital and telematic tools, following organisation and processing logics that are closely related to the express purpose and in any case capable of ensuring the security, integrity and confidentiality of the data.

The data are also stored in paper archives and in digital format for the duration of the call/ranking, for the period of time the child spends at the Polimi easter and summer camps 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; in any case, for a period of no more than 10 years.

The data acquired for the purposes of the call and the ranking shall only be accessed by duly authorized personnel. In particular, Politecnico di Milano staff belonging to the following offices are authorised to process and collect the data required by the Call: HR & Organizational Development Division, Financial Management and Economics Division, and Campus Life Division.

Special categories of data

Upon registration, personal data of a particular nature may be collected in accordance with Article 9 of the EU Regulation, such as:



- data relating to health status (disability), in the case of children and young people with disabilities;
- data relating to allergies/specific diets.

The data will be requested and processed by duly authorised Politecnico di Milano staff and by the service provider, exclusively to ensure the best possible comfort and integration during the Easter/summer period.

Categories of recipients

In relation to the specified purposes, the data may be disclosed to the **Pulcini & Co. - Divisione del Gruppo Elios Ristorazione SpA, via Privata Venezia Giulia 5/a - 20157 Milano** as the Data Processor pursuant to Article 28 of the EU Regulation and the relative restaurant service, identified by means of a specific public tender process (CIG B51A113150).

In particular, personal data may also be disclosed to other public administrations, including in anonymous form in the event that the latter are obliged to process such data for any procedures within their institutional competence, as well as to any public entities to which, under the relevant conditions, disclosure is legally required by the provisions of European system, laws or regulations, in addition to insurance bodies for any accident reports.

Transfer to non-EU countries and/or international organisations

Personal data will be processed by the Data Controller within the territory of the European Union. Should it become necessary for technical and/or operational issues 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 the aree cloud and located outside of the European Union, the processing will be regulated in accordance with the provisions of Chapter V of the EU Regulation and authorized on the basis of specific decisions of the European Union.

Therefore, all necessary precautions will be taken in order to ensure the fullest protection of personal data, basing the transfer:

- (a) on adequacy decisions of the receiving third countries expressed by the European Commission;
- b) on adequate safeguards expressed by the receiving third party pursuant to Article 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 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); 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;
- to the processing of personal data concerning you for the purpose of sending advertisements on courses and cultural events at the Politecnico di Milano.



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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 and/or other competent supervisory authority pursuant to the Regulation.