



POLITECNICO
MILANO 1863

PRIVACY POLICY AND DECLARATION OF CONSENT TO PERSONAL DATA PROCESSING UNDER ART. 13 OF REGULATION EU NO. 679/2016 OF 27 APRIL 2016

This policy is issued under art. 13 of Regulation EU no. 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and in respect of the laws on personal data processing and on the free movement of such data.

Data Controller

Politecnico di Milano - Director General, delegated by the pro-tempore Rector - e-mail: dirgen@polimi.it.

Data Protection Officer

privacy@polimi.it.

Purposes and legal basis of data processing, categories of data and data storage period.

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

Personal data processing purposes	Processing legal basis	Personal data categories
Purpose 1 Green Pass Verification to access Politecnico di Milano and ensure the personnel presence and safety, students' teaching and curricular activities and participation in University events.	Significant public interest under Art. 6, para. 1, letter e) of the EU Regulation. Law no. 87 of 17.06.2021 and by Law no. 133 of 24.09.2021, containing amendments to Decree Law no. 111 of 06.08.2021, particularly Art. 1, paragraph 5 bis.	• General personal data (name, surname, date of birth); • Information on access to University premises. • Special categories of data: a. (Green pass Qr code) b. Any exemption certificates.

Nature of the data

The provision of data is mandatory. In its absence, it will not be possible to enter the premises.

Under Art. 1, paragraph 5 of Italian Law no. 133 of 24.09.2021, containing amendments to Decree Law no. 111 of 06/08/2021, the University may verify compliance with the provisions to access the premises by checking the COVID-19 green certification, which does not display data that led to its issue, including using the mobile application mentioned in Article 13 of the Prime Ministerial Decree of 17 June 2021, published in the Official Gazette no. 143 of 17 June 2021.



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Data processing methods

Data subject data is processed using computerised methods.

- For staff, a specific platform is used to fill in the declaration in the reserved area, with appropriate technical and organisational security measures, which allows the collection and storage of data which the University is authorised to process based on Art. 1, paragraph 5 of Italian Law no. 133 of 24/09/2021. This data is processed only for the time strictly necessary for legal verifications. The verifications are related to the validity date on which the data subject declarations were made.

The University retains only the results of verifications that have had a negative outcome, solely to comply with the law as set out in art. 1, paragraph 2 of Italian Law no. 133 and aimed at applying the measures provided for cases of non-compliance with green pass obligations (e.g. unjustified absence, suspension of employment and salary payments).

- In the remaining cases (checks on students and event participation), the mobile application shall apply under Article 13 of the Prime Ministerial Decree of 17 June 2021, published in the Official Gazette no. 143 of 17 June 2021.

The University takes appropriate organisational and technical measures to ensure the security of personal data.

An authorised person who receives computer notification, under the minimisation principle, of the declarations can only view valid COVID-19 certification or exemption certificates, without any additional information (certification exemption, duration, etc.). **Data subject's health condition data which led to the issue of their exemption certificate, is not collected.**

Automated decision-making process concerning natural persons

The Data Controller processes information from the QR to make decisions based on automated processing for the purposes expressly provided for in Law no. 133 of 24.09.2021, containing amendments to Decree Law no. 111 of 06.08.2021, particularly Art. 1, paragraph 5 bis, which can produce legal effects on the data subject or significantly affect them.

The Controller configures this processing to speed up the QR verification procedures by adopting automated processes that guarantee intrinsic confidentiality in information processing. The activities consider the data necessary to verify the QR exclusively according to the methods under the law.

The automated processing of QR codes is carried out using an application that: implements the control algorithm present in the VerificaC19 app and does not display the information that led to the issue of the Green pass (e.g. date and type of vaccination).

Processing legal basis: Law no. 133 of 24.09.2021 and Art. 9, para. 2, letter g) of the EU Regulation.

Data subjects may exercise the right to object using the methods under Art. 21 of the GDPR.

The processing is necessary for reasons of significant public interest under Art. 9(2)(g). The Data Controller shall process the data proportionate to the purpose while respecting the data subject's right to protect their data by providing appropriate technical and organisational measures for their protection.

The data subject has the right to obtain human intervention from the Data Controller. The data subject may exercise their rights by writing to the Data Controller at the above address, or by email at privacy@polimi.it or info-greenpass@polimi.it, specifying the subject of the request, the right to be exercised and attaching a photocopy of an identity document attesting to the request legitimacy.



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Data subject rights

Under the conditions set out in the EU Regulation, the data subject may request, to exercise the rights set out in Articles 15 to 22 of the GDPR for the processing described in this Policy, and the following rights:

- Access right: right to obtain confirmation as to whether personal data concerning them is being processed and, if so, to obtain access to their data;
- Rectification right: the right to obtain, without undue delay, the rectification of inaccurate personal data concerning the data subject or the integration of incomplete personal data;
- Erasure right (right to be forgotten): the right to obtain, the erasure of personal data concerning them without undue delay. Erasure does not apply to the processing which is necessary for compliance with a legal obligation or to perform a task carried out in the public interest or for the establishment, exercise or defence of legal claims;
- Processing limitation right: right to obtain the limitation of processing;
- Right to object to the processing of personal data;
- The right not to be subject to an automated decision-making process or a decision based solely on automated processing, such as profiling, which produces legal effects concerning data subjects or significantly affects them.

If you believe that your rights have been violated by the data controller or a third party, you can lodge a complaint with the Data Protection Authority, or another relevant supervisory authority under the Regulation.

Updated on 12/10/2021.