

## **PRIVACY POLICY ON DATA PROCESSING UNDER ARTICLE 13 OF REGULATION (EU) 679/2016 OF 27 APRIL 2016**

This privacy policy is issued under 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 law on the processing of personal data and the free movement of such data.

Specifically, this Information Notice refers to the production of videos and multimedia material for the University dissemination and promotion purposes.

### **Data Controller**

Politecnico di Milano - Director General delegated by the pro-tempore Rector- contact: [dirgen@polimi.it](mailto:dirgen@polimi.it).

### **Data Protection Officer and contact point**

E-mail: [privacy@polimi.it](mailto:privacy@polimi.it).

### **Purpose of the processing, legal basis, categories of data and retention period.**

In accordance with European and national legislation (Regulation (EU) 679/2016 of 27 April, henceforth Regulation) we hereby inform you that personal data provided directly by you shall be used for the following purposes:

<b>Intended purpose of the personal data processing</b>	<b>Legal basis of the processing</b>	<b>Categories of personal data subject to processing</b>	<b>Retention period of personal data</b>
<b>Purpose 1</b> Creation and use of multimedia content (PowerPoint, pdf, animations, content created using document cameras or other technologies, editorial sections on printed and web media) for dissemination and promotion activities of Politecnico di Milano's teaching, research and third mission initiatives and events, including in asynchronous mode.	Consent (Art. 6, para. 2(a) of the EU Regulation).	<ul style="list-style-type: none"> <li>• Images and audio/video recordings</li> <li>• Personal data</li> <li>• Contact details</li> </ul>	The data will be kept for a period strictly necessary for the fulfilment of the intended purpose.

It should be noted that consent is given by the data subject:

- by filling in the appropriate form for individuals systematically employed (e.g., teaching staff);
- by voluntarily going to the rooms in which the video recording service of the initiatives and events takes place, also including remote contributions in the case of video-conferences. The rooms where video recording is to take place will be clearly signposted;
- by voluntary act of transmitting multimedia content as expressed in Purpose 1 to the offices of Politecnico di Milano, for dissemination and promotion activities of didactics, research, third mission and events.

Parents or those exercising parental responsibility of minors, or those under 14 years of age, are compulsorily required to carefully read the privacy policy.

Please also note that for Purpose 1 outlined in the table, the data subject will be subject to audio-video filming and recording. The data subject to processing, including images and audio/video recordings (hereinafter, "Images") taken during the event, including in partial, modified or adapted form, shall be processed in full compliance with Regulation (EU) 2016/679.

The data will be processed, with the aid of electronic means, by persons specifically appointed for the dissemination and communication activities of the Data Controller. The Images collected shall be stored, including in electronic form and on any media, for the purposes and within the limits outlined above and may be disseminated on institutional websites and via social networks (including but not limited to Facebook, Twitter, YouTube) under Italian Law No 150/2000. The use of the images does not entitle the data subject to any compensation.

The Data Controller has the right to access or disclose the User's Images without any consent, under Art. 97 of Law no. 633/1941. With the authorisation, the signatory grants non-exclusive license to use the materials, transferable to third parties and without duration or geographical limits. It 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. Under the aforementioned article and under Art. 10 of the Italian Civil Code, the Images will not be used in any way that could prejudice the honour, reputation or dignity of the person portrayed, filmed or recorded.

### **Nature of the data**

The provision of the data requested for Purpose 1 outlined in the table is optional. In the absence of the requested data, the provision of the planned services cannot be guaranteed.

### **Processing methods**

Data is collected in compliance with the principles of relevance, completeness and non-surplus in relation to the purposes for which it is processed. Personal data is processed in compliance with the principles of lawfulness, correctness and transparency, as provided for by the Law, with the aid of devices designed to record and store the data and in any case in such a way as to guarantee its security and to protect the utmost confidentiality of the data subject. Specific security measures are observed to prevent data loss, unlawful or incorrect use and unauthorised access in full compliance with Article 32 of the GDPR.

The videos and multimedia materials will be published on platforms designed to promote the University's image or on the institutional pages of the University dedicated to promotion.

The data (video and multimedia promotional and dissemination material), in addition to publication on the channels indicated in the Purposes, may be used in local and national dissemination events to promote the University for orientation, promotion and communication purposes.

Access to the data acquired for Purpose 1 outlined in the table is only permitted to duly authorised personnel.

### **Categories of recipients**

The data processed for the above purposes will in any case be accessible to the employees and collaborators assigned to the relevant University offices authorised to process the data under Article 29 of the Regulation.



The processed data will also be accessible to natural or legal persons who provide consultancy or service activities to the University for the purpose of providing recording and editing services (e.g., companies providing support services for video-conferencing and integrated services for university buildings, professionals and consultants appointed by the data controller).

In this case, these persons will act as data controller under Article 28 of the Regulation.

### **Transfer to non-EU countries or international organisations**

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

Should it become necessary, for technical and/or operational reasons, to make use of parties located outside of the European Union, or should it become necessary to transfer some of the data collected to technical systems and services managed in the 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 authorised on the basis of specific decisions by the European Union.

All of the necessary precautions will therefore be implemented in order to ensure the utmost protection of the personal data, the transfer being based:

- a) on adequacy decisions of recipient third countries expressed by the European Commission;
- b) on appropriate safeguards expressed by the receiving third party under Art. 46 of the EU Regulation;
- c) on the adoption of corporate binding rules.

### **Rights of the data subject**

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 applies), the transformation into anonymous form or the blocking of data processed in violation of the law, including data that do not need to be kept for the purposes for which the data was 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.

These rights can be exercised by contacting [privacy@polimi.it](mailto: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 under the Regulation.

Milan, February 2025.