



PRIVACY POLICY PURSUANT TO ARTICLE 13 OF REGULATION (EU) 679/2016 OF 27 APRIL 2016

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.

In particular, this privacy policy concerns the processing of personal data as part of the electoral procedures carried out at the university, pursuant to the Statute of the Politecnico di Milano (R.D. no. 622 of 23 February 2012) and the General Regulations of the university (R.D. no. 2956 of 20 November 2012), subsequently amended by R.D. no. 394 of 27 January 2015).

Data Controller

The Data Controller is the Politecnico di Milano - Director General delegated by the Rector pro tempore - contact: dirgen@polimi.it.

Data Protection Officer and contact details

Dr. Vincenzo Del Core, contact: privacy@polimi.it - tel.: 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, henceforth "Regulation"), we hereby inform you that your 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
<p>Purpose 1 The data provided will be processed for the use of online voting services, as part of the electoral procedures of the student representatives of the University's structures and bodies.</p>	<p>Public interest (Article 6, paragraph 1, letter e) of the Regulation - Statute and General Regulations of the University).</p>	<ul style="list-style-type: none"> • Identifying data; • Personal details; • Contact details (e-mail); • Student ID; • Academic information. 	<p>The collected data will be kept for a period of 2 years.</p>
<p>Purpose 2 The data provided will be processed for the use of online voting services, as part of the electoral procedures of the teaching staff (PD) and technical and administrative staff (PTA) representatives of the University's structures and bodies.</p>	<p>Public interest (Article 6, paragraph 1, letter e) of the Regulation).</p>	<ul style="list-style-type: none"> • Identifying data; • Personal details; • Contact details (e-mail); • PD or PTA ID • Academic information. 	<p>The collected data will be kept for a period of 2 years.</p>



Purpose 3 The data provided will be processed for the use of online voting services to conduct electoral procedures of the University's structures and bodies, for the performance of a task carried out in the public interest and for compliance with specific legal obligations comprising the Covid-19 containment measures (Art. 6, paragraph 1, letters e) and c) of the EU Regulation).	Public interest (Article 6, paragraph 1, letter e) of the Regulation - Statute and General Regulations of the University).	<ul style="list-style-type: none">• Identifying data;• Personal details;• Contact details (e-mail);• Student, PD or PTA ID• Academic information.	The collected data will be kept for a period of 2 years.
---	--	---	--

Nature of the data

The provision of data is optional. Refusal to provide the data prevents us from pursuing the intended purposes.

Processing methods

Processing for the above-mentioned purposes is carried out digitally, with electronic tools provided by the ELIGO platform.

The data acquired for the aforementioned purposes shall only be accessed by duly authorised administrative personnel.

In accordance with the principle of transparency of the electoral procedure, the lists of supporters for each Electoral Roll are available in the electoral body Reserved Area, in order to perform a prior check on the legitimacy of the Electoral Rolls. These lists will remain available until the Electoral Roll is constituted and validated.

Categories of recipients

Data will be shared with staff of the university structures who are involved in the achievement of the above-mentioned purposes as well as with ID TECHNOLOGY srl, the supplier of the ELIGO platform, which is for this purpose designated as the Data Processor, pursuant to Art. 28 of the Regulation by means of a specific appointment.

Data may also be shared with other third parties in compliance with a legal obligation and/or an order of the court.

Retention period of personal data

At the end of the period per TABLE 1, the data necessary for the proper functioning of the Public Administration will be indefinitely kept for archiving and storage purposes, in compliance with the principle of transparency and the principles of lawfulness, proportionality and data minimisation.

Transfer to non-EU countries or international organisations

Personal data shall in no way be transferred to non-EU countries or international organisations.

Rights of data subjects

As a data subject, you can ask the Data Controller for the following at any time:



POLITECNICO
MILANO 1863

- 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; restriction of the processing of your personal data (in the event of one of the cases 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.

Since the processing is carried out for the performance of a task of public interest vested in the Data Controller, it will not be possible to comply with requests to delete personal data once they have been acquired, pursuant to Art. 17, paragraph 3, letter b) of the Regulation.

The exercising of the right to oppose the processing of personal data, pursuant to Art. 21 of the Regulation, is not applicable as voting is a guaranteed right of superior interest. In consideration of an appropriate balance, the Data Controller will not be able to refrain from processing personal data as there are compelling legitimate reasons (exercising the right for the formation of academic representatives and other collegiate bodies), which override the interests, rights and freedoms of the data subject for the processing of personal data alone.

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 promotional material.

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.