



**Politecnico
di Torino**

Politecnico di Torino Students' Data Privacy Policy (Art. 13 of the Regulation EU 2016/679)

We provide you the following information on the processing of your personal data in accordance with the General Data Protection Regulation (EU Regulation 679/2016).

CONTACTS

The **Data Controller** is Politecnico di Torino, represented by the Rector *pro tempore* as legal representative, with statutory seat in Corso Duca degli Abruzzi, n. 24, 10129 – Turin.

You can contact the Data Controller at: politecnicoditorino@pec.polito.it (certified e-mail)

For further information and inquiries write to: privacy@polito.it

You can contact the **Data Protection Officer** (DPO) of Politecnico di Torino for inquiries on the processing of your personal data and your rights at: dpo@polito.it; dpo@pec.polito.it (certified e-mail).

TYPE OF PERSONAL DATA, PURPOSE, PRINCIPLES AND LEGAL BASIS FOR PROCESSING

The personal data that, also in relation to specific situations or in order to meet requests from students, may be subject to processing, in paper and electronic form, are, by way of example:

- personal data you have provided;
- data relating to your previous school career, provided at the time of enrolment;
- data relating to your university career at Politecnico di Torino (study plans, exams passed, qualifications obtained);
- data relating to your participation in projects, initiatives, pathways, promoted or supported by the University, including those not strictly curricular (e.g. Student teams, Challenge and other entrepreneurship training initiatives, honours programmes, TLLab initiatives, sports, surveys on topics of interest to the University, etc.);
- payments you have made for fees, contributions, penalties;



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- any self-certification of your family economic situation, submitted in order to obtain a reduction in fees and contributions;
- categories of special data such as ethnicity, refugee status, data relating to health, sexual orientation;
- data relating to criminal convictions or offences and related security measures;
- scholarships that you have obtained from the Politecnico di Torino, the Ente Regionale per il Diritto allo Studio Universitario or other organisations;
- part-time collaborations you have performed at the Politecnico di Torino;
- any sanctions imposed.

Your personal data shall be processed by Polytechnic of Turin (Data Controller) in accordance with:

- the principles of lawfulness, fairness, transparency and data minimization referred to in article 5, paragraph 1 of the GDPR;
- article 6, paragraph 1, letter e) of the GDPR [*"processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller"*];
- for special categories of personal data (such as images and voice recorded during online classes and remote exams), the University will process your personal data exclusively for the purposes provided for by the law, in accordance with art. 9, par. 2, letter g) [*"processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law"*] and in compliance with art. 2-sexies of Legislative decree no. 196/2003. Reference is made to the specific privacy policy (Processing of personal data provided by students in order to take remote exam at Politecnico di Torino).

We inform you that the Polytechnic of Turin, as Data Controller, will collect your data, including that relating to your family members, at the time of enrolment, during your training course and also with regard to the provision of Open Badge.

In compliance with the principles of lawfulness, correctness, transparency, adequacy, relevance and necessity referred to in art. 5, paragraph 1, of the GDPR, the Polytechnic of Turin will process your personal data, as part of its **institutional purposes** connected to **teaching activities**, including those of an innovative nature such as those promoted by TLLab, to **research**, to the **third mission** and to **administrative activity**, as well as for the provision of specific services requested by users.



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The **legal bases** of the processing are:

- art. 6, par. 1, letter c) of the GDPR, i.e. the fulfilment of a **legal obligation** to which the Data Controller is subject, for example for the purpose relating to the verification of self-certifications;
- art. 6, par. 1, letter e) of the GDPR and art. 2-ter of Legislative Decree 196/2003, i.e. the execution of a task carried out in the **public interest** or connected to the exercise of public powers vested in the Data Controller;
- art. 9, par. 2, letter g), in the case of **special categories of data**, if the processing is necessary for reasons of **significant public interest** on the basis of Union or Member State law and pursuant to art. 2-sexies of Legislative Decree 196/2003 if such processing is provided for by European Union law or, in domestic law, by provisions of law or regulation or general administrative acts.

PERSONS AUTHORISED TO PROCESS THE PERSONAL DATA, POSSIBLE RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA AND DATA PROCESSOR

Your personal data are processed by the Data Controller and by persons belonging to the University Structures authorised by the Data Controller to process them in relation to their functions and competences.

Your data can be disclosed outside the University in the following cases:

- at the request of public authorities when they need your data for institutional purposes (for instance, information is periodically exchanged with the: Ministry of Education, University and Research, National Student Register Office, Ministry of Economy and Finance, Ministry of Foreign Affairs, EDISU – the Regional Agency for the Right to University Education, ISTAT - Italian National Statistical Institute, CNVSU - National Agency for the Evaluation of the University and Research Systems and Osservatorio Regionale per l'Università e per il diritto allo studio Universitario);
- at the request of judicial authorities;
- when you register for your Final Examination you are asked to give your consent to the transfer of some of your personal data (expressly indicated) to businesses or institutions which declare to use them for employment purposes or to advertise training and cultural activities;
- when you apply for a Specializing Master's Programme organized in cooperation with external partners (businesses/organizations), you may be asked to give your consent to the transfer of your personal data to these



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partners who may offer you training opportunities or help you enter the world of work. Any other form of data processing or disclosure is not permitted;

- when you take part in an international mobility project, you may be asked to give your consent to the transfer of your personal data to universities and academic institutions (based also outside the European Union), funding organizations and diplomatic missions.

Personal data are stored in the university servers (located inside Politecnico) and/or in external servers which belong to providers of technical and administrative services. These service providers may have access to your personal data exclusively for the service they render. In this case Politecnico engages them as Processors in accordance with article 28 of the GDPR.

TRANSFER OF PERSONAL DATA

Personal data collected for specific institutional purposes (i.e., internships, job placements at companies or institutions located outside the European Union) may be transferred to non-EU countries (third countries).

The Data Controller ensures that a transfer of personal data to a third country may take place where the EU Commission has decided that the third country in question ensures an adequate level of protection (art. 45 – GDPR) or has provided appropriate safeguards (art. 46 – GDPR) or when the transfer is necessary for important reasons of public interest or upon prior explicit consent of the data subject (art. 49, par.1, letter a) and d) – GDPR).

PERIOD FOR WHICH PERSONAL DATA ARE STORED

The personal data related to your academic progress at Politecnico di Torino are kept for an unlimited period of time in accordance with the achieving obligations imposed by the law. Other personal data are kept for no longer than is necessary for the purposes for which the personal data are processed (art. 5 – GDPR).

PROVIDING PERSONAL DATA

You are required to provide your personal data to Politecnico di Torino. If you refuse to provide your personal data, Politecnico cannot process your requests.



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RIGHTS OF THE DATA SUBJECT

You are the Data Subject and you have the right to obtain from the Data Controller (in accordance with articles 15 et seq. of the GDPR):

- access to your personal data and to the information referred to in art. 15 of the GDPR;
- rectification of inaccurate personal data (including the right to have incomplete personal data completed);
- erasure of your personal data (except for data which must be kept by Politecnico di Torino) unless there are overriding legitimate grounds for the processing;
- restriction of processing pursuant to art. 18 of the GDPR.

You also have the right to:

- object to the processing of your personal data, except when the processing is required for your use of services;
- withdraw your consent given for non-compulsory processing of personal data, without affecting the lawfulness of processing based on consent before its withdrawal.

Please contact the Data Controller if you want to exercise your rights.

COMPLAINT

You have the right to contact the Italian Data Protection Authority (Garante per la protezione dei dati personali) following the instructions available at:

<https://www.garanteprivacy.it/home/docweb/-/docweb-display/docweb/4535524>

This privacy statement has been updated on 05/10/2023