

Privacy Statement

PRIVACY STATEMENT PURSUANT TO ART. 13 OF REGULATION (EU) NO 679/2016 OF 27 APRIL 2016

This statement is issued pursuant to Article 13 of Regulation (EU) no. 679/2016 (hereinafter EU Regulation) and refers to the “Survey on Public Transport”.

Data Controller

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

Internal Data Processor

Dr. Francesco Cavazzana, Manager of the Supply and Facility Management (AGIS) at Politecnico di Milano, email: francesco.cavazzana@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.

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

For the purposes of applying the relevant European and national legislation (Regulation No 679/2016), we inform you that your personal data shall be used for the following purposes:

| Intended purpose of personal data processing | Categories of Data Subjects | Legal basis of the processing | Categories of personal data to processing | Retention period of personal data |
|---|--|--|--|--|
| Purpose 1 Participation in the Survey on Public Transport to update the Home-University Commute Plan. | Teaching Staff, Technical and Administrative Staff, Temporary Research Fellows, PhD Students, Collaborators, Students. | Consent Article 6(1)(a) of the EU Regulation). | <ul style="list-style-type: none">• Identifying data• Contact details• Academic information Surveys on mobility about the use of public transport by the Politecnico community | The data collected will be retained for 8 years, |

Nature of the data

Providing the data requested for Purpose 1 - Participation in the questionnaire is optional. Failure to provide consent and the requested data does not allow the questionnaire to be filled in.

Processing methods

The data is collected through an application specifically implemented by ASICT in the Online Services

Portal, using the open-source software Limesurvey, and will be processed in compliance with all security and confidentiality measures.

The data collected through participation in the questionnaire will be anonymised and aggregated for drawing up the Home-University Commute Plan and the CO₂ emission inventories.

Personal data collected through the questionnaire will also be processed for producing periodic statistics and will therefore be stored in pseudonymised form, for the sole purpose of allowing to link the answers given to future questionnaires completed by the same respondent. Pseudonymised data will not be shared for purposes other than the one described in the table, i.e., for the participation in the questionnaire about the use of public transport by the Politecnico community and to update the Home-University Commute Plan.

The data collected, subject to the explicit and optional consent of the Data Subject, may be used for research activities, in accordance with Article 5(1)(b) and Article 89(1) of the EU Regulation, and anonymity of respondents is ensured from the outset when they fill in the questionnaire. In this case, the data will be transferred in anonymous form to research groups at Politecnico di Milano, as identified from time to time and especially with reference to the field of sustainable mobility management and planning, subject to consent from the Data Controller. No longitudinal study activities may be carried out.

Pursuant to Article 11 (2) of the Regulation, following personal data anonymisation, the Data Controller will no longer be able to identify the Data Subject. For this purpose, the rights set out in Articles 15 to 20 shall not apply unless the Data Subject provides further information that allows for him/her to be identified.

The data shall only be disclosed in anonymous and aggregated form by means of, e.g., educational activities, scientific publications, statistics and scientific conferences.

The data acquired for Purpose 1 shall only be accessed by duly authorised staff.

Categories of recipients

In relation to the purposes indicated, personal data may be disclosed to the public and/or private entities, or may be disclosed to companies and/or persons who provide services, including externally, on behalf of the Data Controller. In particular, the data collected may be transmitted to service providers that are necessary for the delivery of the initiative, for the drafting of the Home-University Commute Plan (HUCP) and, if agreed, for carrying out research activities; Politecnico di Milano will formally appoint these parties as 'External data processors'.

In detail, the entities recognised as recipients of personal data will be identified from time to time in relation to specific requirements and will be formally recognised and appointed as Data Processors pursuant to Article 28 of the EU Regulation.

Transfer to non-EU countries or international organisations

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

Should it become necessary for technical and/or operational reasons 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 Cloud and located outside the European Union, data processing shall be regulated in accordance with Chapter 5 of the Regulation and authorised on the basis of specific decisions by the European Union.

All of the necessary precautions shall therefore be taken to ensure the maximum protection of personal data, basing the transfer on:

- a) adequacy decisions on third country recipients as expressed by the European Commission;
- b) appropriate safeguards provided by the third party recipient under Article 46 of the Regulation;
- c) the adoption of binding corporate rules *Binding Corporate 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 rectification of inaccurate data or the completion of incomplete data; the deletion of personal data concerning you (where any of the conditions indicated in Art. 17(1) of the Regulation apply 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(1) of the Regulation applies), the anonymisation or 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 programmes and cultural events at Politecnico di Milano.

These rights can be exercised by contacting privacy@polimi.it.

If you believe the Data Controller and/or a third party to have violated your rights, you may file a complaint with the Data Protection Authority and/or other competent supervisory authority under the Regulation.

Milan, 26/03/2025