

PRIVACY POLICY – STUDENTS

Dear Sir/Madam (hereinafter the Data Subjects)

The following paragraphs provide a series of information useful to understand how we process personal data, in compliance with the provisions on data protection and the principles of lawfulness, fairness, transparency, purpose limitation and storage, data minimization, accuracy, integrity and confidentiality.

Therefore, we encourage you to read this policy carefully, specifying that in order to obtain complete information about the processing of personal data by POLI.design, data subjects are invited to view the [privacy page](#) of the website.

1. DEFINITIONS

Privacy legislation (applicable to the protection of personal data)	Set of all legislation referring to the protection of personal data: EU Regulation 679/2016 (GDPR or RGPD), D.Lgs. 196/2003 (Code), D.Lgs. 101/2018, D.Lgs. 51/2018, Guidelines of the EDPB (formerly WP29), deontological rules and general authorizations of the Data Protection Authority, measures of the Data Protection Authority where applicable, international regulations of scope
Processing	Any operation or set of operations, performed whether or not by automated means, applied to personal data or sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission/dissemination or any other form of making available, comparison or interconnection, restriction, erasure or destruction.
Data Controller	The natural or legal person, public authority, service or other body which, individually or together with others, determines the purposes and means of the processing of personal data.
Personal Data	Any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is any natural person who can be identified, directly or indirectly, with particular reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more characteristic elements of his or her identity: physical physiological, genetic, mental, economic, cultural or social.
Special categories of personal data (formerly sensitive)	Personal information relating to ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health status, life or sexual orientation of the data subject, as well as genetic, biometric and geo-location information.
Data related to criminal convictions and offenses	Personal information related to criminal convictions, felonies, or related security measures.

2. THE DATA CONTROLLER

POLI.design Srl (hereinafter POLI.design) - located in Via Don Giovanni Verità n. 25, 20158 Milan; VAT number 12878090153 – is the Data Controller, in the person of the pro-tempore Legal Representative, of your personal data as defined in the **DEFINITIONS** paragraph of this document. For any information you may contact him at the e-mail address privacy@polidesign.net.

The Data Controller has proceeded to identify and appoint a Data Protection Officer or Data Protection Officer (hereinafter DPO), who is available at the e-mail address dpo@polidesign.net.

Regarding the data related to applications and participation in the courses organized by POLI.design, it should be noted that they will be processed in a co-ownership relationship with POLITECNICO MILANO (P.IVA 04376620151), based in Piazza Leonardo da Vinci, 32 20133 Milano

3. ORIGIN OF YOUR DATA and CATEGORY OF DATA COLLECTED.

The data being processed are those provided by you at the time of your application and those generated or provided during the training. The data collected are first name, last name, e-mail address telephone number and other personal and contact data as well as data related to evaluations, participation, and data emerging from your processing.

4. PURPOSE OF THE PROCESSING and LEGAL BASIS OF THE PROCESSING.

A. *Training organization*

POLI.design processes your personal data in order to properly organize the course. The data are also shared with POLITECNICO di MILANO and with any partners/companies that organize and manage the Course together with POLI.design. These treatments are effects by virtue of **obligations arising from the contract** with you in place.

B. *Accounting and tax obligations*

Your information will also be processed for the purpose of proper bookkeeping and tax records as well as for purposes of entering into and maintaining contracts. This will be done for contractual purposes and for **legal obligations**.

C. *Images*

Its images can be collected and processed by POLI.design for two different reasons:

- **Didactic:** these are, for example, recordings of lectures shared with other students in

the course. This processing is done for contractual reasons (providing some courses the possibility to connect remotely and interact) and on the basis of a legitimate interest of the students.

- *Advertising and marketing:* these are photos and videos collected for the purpose of publication on official POLI.design channels and on any course brochures. This processing can only take place by virtue of express consent.

D. Marketing - Softspam

In some cases, following your demonstration of interest or following the finalization of a contractual relationship, POLI.design may decide to re-contact you for reasons of assistance or to provide you with communications deemed of interest to you. In this case POLI.design will act by virtue of **legitimate interest**.

E. Condivisione con Partner

POLI.design shares your data with the partner companies organizing the course and this is done to satisfy contractual obligations. However, the case of sending data to third parties for internship purposes is different. This can only take place with your consent.

5. MANDATORY REPORTING OF DATA

The provision of the requested personal data is not obligatory for the purposes contained in the paragraph **PURPOSE OF THE PROCESSING** and **LEGAL BASIS** of this information notice, however, in the absence of the requested data it is possible that POLI.design will not be able to correctly provide the requested service. With regard to the processing carried out by virtue of consent (and, therefore, the collection and publication of images, contact for marketing purposes, sharing with third parties for internship purposes) the same are possible only in the presence of your appropriate consent. Without it, we would not be able to proceed with the processing under consideration, without, however, hindering your enrollment in the course. Please note that consent is never mandatory and that, even once given, it is revocable at any time, without affecting the processing carried out in its force.

6. PLACE OF DATA PROCESSING and MODALITIES OF DATA PROCESSING.

Your data are processed within the European Union. All processing operations are carried out by means of IT/electronic tools, including automated tools, and on paper. In case of transfer to non-EU territory, the Data Controller will take care to adopt all the guarantees provided by the GDPR in this regard.

7. WITH WHOM WE SHARE DATA

PERSONS AUTHORIZED TO PROCESS: these are internal figures, specifically partners, employees and collaborators of POLI.design who collect or process your data by reason of

their respective duties and according to the profiles attributed to them.

DATA PROCESSORS: these are third-party collaborators who process data on behalf of POLI.design through the stipulation of a special agreement of appointment as Manager, by means of which the operations delegated to the third party are defined, as well as the security measures that the third party must adopt in order to best protect the information it obtains from the same Data Controller. In particular, your data could be processed by:

Teachers;
Course Partner Companies;
Cloud services for enrollment management and CRM;
Email hosting service and cloud backup service;
Website hosting service;
External companies with whom we collaborate.

The list of third parties appointed as Data Processors is available at the office, and can be shown to Data Subjects upon special request.

8. RETENTION PERIOD OF COLLECTED DATA

Personal data collected for organization and training purposes, as well as for tax and contractual obligations, will be retained for up to 10 years, unless otherwise required by law. Data collected for marketing or, in general, by virtue of special consent, will be retained until opted out unless the purpose is exhausted.

9. YOUR RIGHTS

The Data Subjects have the right to obtain, in the cases provided for, access to their personal data and the rectification and/or cancellation of such data and/or the limitation of the processing that concerns them and/or to oppose the processing (Articles 15 et seq. of the GDPR). The appropriate request is to be submitted directly to POLI.design at the contact details indicated in the paragraph **DATA CONTROLLER** of this policy. The Data Subjects who believe that the processing of personal data, carried out according to the methods indicated herein, takes place in violation of the provisions of the GDPR, have the right to lodge a complaint with the Supervisor Authority, as provided for in Art. 77 of the GDPR itself, or to take appropriate legal action (Art. 79 of the GDPR).