

PRIVACY POLICY – TEACHING STAFF

Dear Data Subject,

The following paragraphs contain useful information for understanding how we process your personal data, in compliance with regulations on the protection of personal data and the principles of lawfulness, correctness, transparency, restrictions regarding the purpose of processing and data retention, data minimization, accuracy, integrity and confidentiality.

1. DEFINITIONS

Privacy Legislation (in force regarding personal data protection)	All legislation relating to the protection of personal data: EU Regulation 679/2016 (GDPR), Legislative Decree 196/2003 (Code), Legislative Decree 101/2018, Legislative Decree 51/2018, EDPB Guidelines (formerly Art. 29 WP), Deontological rules and general authorisations of the Italian Data Protection Authority, Measures of the Italian Data Protection Authority where applicable, International legislation on the subject.
Data Processing	Any operation or set of operations, carried out with or without the use of automated processes and applied to personal data or sets of personal data, such as collection, registration, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission / dissemination or any other form of disclosure, comparison or interconnection, restriction, deletion or destruction.
Data Controller	The natural or legal person, public authority, service or other entity that, individually or jointly, determines the purposes and methods of personal data processing.
Personal Data	Any information relating to an identified or identifiable natural person (“Data Subject”); identifiable understood as any natural person who can be identified, directly or indirectly, with specific reference to an identifier such as name, identification number, location data, online identifier, or one or more characteristic features of their identity: physical, physiological, genetic, psychic, economic, cultural or social.
Special Categories of Personal Data (formerly sensitive data)	Personal information relating to ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, state of health, life or sexual orientation of the Data Subject.

2. DATA CONTROLLER

POLI.design Srl (hereinafter, POLI.design) – with registered office in Via Don Giovanni Verità 25, 20158 Milan; Tax Code/VAT Number 12878090153 – in the person of its pro-tempore legal representative, is the Data Controller of your personal data as defined in the **DEFINITIONS** section above. For any information, please contact the email address privacy@polidesign.net.

The Data Controller has selected and appointed a Data Protection Officer (hereinafter, DPO), who can be reached at the email address dpo@polidesign.net.

With reference to data on the selection and management of teaching staff for the courses organized by POLI.design, please note that this data shall be processed jointly with POLITECNICO MILANO (VAT Number 04376620151), with registered office in Piazza Leonardo da Vinci, 32 20133 Milan.

3. ORIGIN and TYPE OF DATA COLLECTED

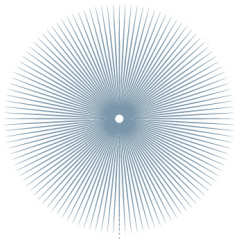
The Data Controller processes ordinary and special personal data for the establishment and management of relationships with teaching staff. More specifically, Poli.design processes your personal, contact and tax data, as well as data relating to your image. In addition, it may process health-related data where necessary.

This data is collected directly from the Data Subjects.

4. PURPOSE and LAWFULNESS OF PROCESSING

Your ordinary data may be processed without your express consent (Arts. 6 and 9 of the GDPR) for the following purposes:

- Fulfilment of pre-contractual and contractual obligations deriving from existing relationships with you;
- Fulfilment of legal obligations concerning taxes;
- Interaction with the class: if the course provides the option of using distance learning, your image data shall be shared with students and coordinators. This occurs for contractual reasons and by virtue of the legitimate interest of the students;
- Fulfilment of specific obligations and rights of the Data Controller or the Data Subject regarding labour law and social security. General Authorization No. 1/2016 still applies as the legal basis for the processing of such data, as confirmed by the Measure of the Italian



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Data Protection Authority issued on 5 June 2019 (web document no. 9124510);

- To exercise the rights of the Data Controller.

In addition, data related to your image may be processed subject to your specific consent (Art. 6 (a) of the GDPR) for the purposes of marketing and promoting services provided by the Data Controller through its official channels.

5. COMPULSORY COMMUNICATION OF DATA

The provision of personal data is compulsory for the purposes indicated in the section **PURPOSE and LAWFULNESS OF PROCESSING** above and does not require consent; however, in the absence of such data it shall not be possible to establish the employment relationship.

As regards the use of your image data for promotional and marketing purposes, your consent is required; therefore, in absence of your consent we will not be able to publish such data on our official channels for information/promotional purposes. In this regard, please note that consent is always revocable, without prejudice to any processing carried out during its validity.

6. TERRITORIAL SCOPE and PROCESSING METHODS

We generally try to avoid transferring data outside of the European Union. In any case, it is understood that the Data Controller shall have the right to transfer data to non-EU countries if necessary, taking care to adopt all guarantees envisaged by the GDPR in this regard.

All processing operations are carried out by means of computer/electronic tools, including automated tools, and on paper.

7. AUTHORISED DATA PROCESSORS

Your data is processed by employees and collaborators (processors) authorised by POLI.design.

8. DISCLOSURE TO THIRD PARTIES

The Data Controller may disclose your data to POLITECNICO di MILANO, the Public Administration, the Italian Revenue Agency and/or Judicial Authorities, as well as any other parties to whom communication is mandatory or required by law.

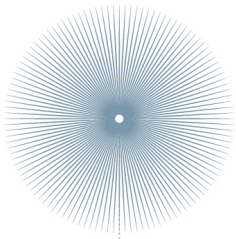
POLI.design
Società consortile
a responsabilità limitata

Campus Bovisa
Via Don Giovanni Verità 25,
20158 – Milano

T. +39 02 2399 7206

info@polidesign.net
www.polidesign.net

P.I. / C.F. 12878090153
C.C.I.A.A. Milano 192631
REA 1593683



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Besides these third parties, which may come into contact with your personal data by virtue of existing relationships with POLI.design since specifically appointed as “Data Processors” pursuant to Art. 28 of the GDPR, the aforementioned data shall not be disclosed or disseminated to other third parties. The list of Data Processors is available upon request.

9. DATA RETENTION

Your personal data will be retained for 10 (ten) years from the date of last contact (in accordance with the provisions of Article 2220 of the Italian Civil Code) and will be stored on in-house and SaaS servers.

Image data collected for promotional and marketing purposes will be retained until the Data Subject revokes consent for its use.

10. RIGHTS OF THE DATA SUBJECT

In the cases envisaged, Data Subjects have the right to obtain access to their personal data, the rectification and/or erasure of the same and/or the restriction of processing and/or the right to object to the processing of personal data (Art. 15 et. seq. of the GDPR). A specific request must be sent directly to POLI.design at the email address indicated in the section **DATA CONTROLLER** above. Data Subjects who believe that the processing of their personal data, carried out in the manner described herein, violates the provisions of the GDPR have the right to lodge a complaint with the Supervisory Authority, as provided by Art. 77 of the GDPR, or the right to an effective judicial remedy (Art. 79 of the GDPR).