






INFORMATION ON THE PROCESSING OF PERSONAL DATA REGULATION (EU) 2016/679

PREMISE	
<p>The Regulation (EU) 2016/679 (hereinafter, "GDPR") as well as other regulatory provisions (including Legislative Decree 196/2003, hereinafter, "Privacy Code"), protect personal data and enforce a set of obligations to those who process personal data referring to natural persons, defined as data subjects. Among the most important obligations that the GDPR imposes, there is informing the data subjects and acquiring, when required as a legal basis, the consent to the processing activity.</p> <p>Given that the data processing carried out by MIP will be based on the principles of lawfulness, fairness and transparency, minimization and limitation of data storage, accuracy, integrity and confidentiality, the following information is provided:</p>	

	Data Controller	<p>MIP Politecnico di Milano Graduate School of Business S.C.p.A. Via Lambruschini 4C - Building 26/A 20156 Milano Tel: +39 02 2399 2820 Fax: +39 02 2399 2844 Mail: privacy@gsom.polimi.it</p>
	Data Protection Officer (DPO)	<p>Data Protection Officer c/o MIP Politecnico di Milano Graduate School of Business S.C.p.A. Mail: dpo@gsom.polimi.it</p>


PROCESSED PERSONAL DATA	
	<p>The processed personal data are:</p> <ul style="list-style-type: none"> • Tax identification number or other personal identification numbers • Contact information • Job and work-related data • Education and culture • Name, address or other personal identification information • Banking and tax data • Images • Information related to the usage of e-learning platforms

SOURCE OF THE PERSONAL DATA	
	<p>The personal data provided directly by the data subject or acquired by third parties (e.g., by the subscriber of the contract to enroll in the course, on behalf of the data subject) are processed lawfully, according to a specific legal basis, and only for the purposes indicated in the table below.</p>


 PURPOSES	LEGAL BASIS
	DATA RETENTION
a) managing the candidate's application for MIP courses, through a pre-selection and guidance process, to verify that there are no impediments to enroll in the chosen course and, if necessary, select the appropriate course	6.1.b Pre-contractual <u>Storage period</u> <i>Until the purposes pursued are fulfilled.</i>
b) planning, organizing and managing the operational activities of MIP courses; carrying out educational activities, also through e-learning, and assessing, also on-line, the preparation of Participants; organizing project works and work experiences; supporting Participants during the search for work opportunities, career progressions and outplacement ¹ ; managing the administrative activities; providing IT services to Participants during the educational activities	6.1.b-c Contract - Legal obligation, fulfillment of contractual services <u>Storage period</u> <i>Until the purposes pursued are fulfilled. Statutory storage period.</i>
c) facilitating the networking among Participants and/or members of the MIP Community, as well as to facilitate internal activity, creating a file containing a photo, name and place of residency of the Participants, as well as the company in which they work and their role. The distribution of this file will be restricted, as it is intended for MIP faculty and staff, as well as for Participants who are simultaneously attending other courses	6.1.b Contract <u>Storage period</u> <i>Data will be processed for 6 months after the end of the course.</i>
d) if applicable and only for courses with formative credits, transmitting the data related to the participation in the course to Politecnico di Milano, in order to approve the formative credits earned and issue the certifications	6.1.b-c Contract - Legal obligation, fulfillment of contractual services <u>Storage period</u> <i>Until the purposes pursued are fulfilled. Statutory storage period.</i>
e) if applicable to the chosen course, transmitting the Curriculum Vitae and other personal data of the Participant to other Business Schools, professionals, companies and institutions, in order to participate in initiatives, experiences and trainings conducted outside MIP	6.1.b Contract <u>Storage period</u> <i>Data will be processed for 1 year after the end of the course.</i>
f) if applicable to the chosen course, admitting the Participant to the Alumni Community, maintaining an	6.1.b Contract


¹ MIP's policy states that disclosure of personal data related to the supporting activities for the placement and/or outplacement of Participants can only take place for personal enrollments, while MIP does not provide this service when there is even a partial funding by the Company of the Participant, unless it is the same Company that authorizes MIP to publish the profile of the Participant.


informative and communicative relationship, also for the purpose of providing ancillary services or benefits to the Participant under the signed contract	<p><u>Storage period</u> <i>Until the purposes pursued are fulfilled.</i></p>
g) in the event of third-party quality inspections or audits to which MIP may be subjected and pertaining to the services offered by the school to its students, transmitting the Participant's personal data to these organizations which conduct Surveys for School of Management Rankings	<p>6.1.f Legitimate interest</p> <p><u>Storage period</u> <i>Until the purposes pursued are fulfilled.</i></p>
h) if applicable and when requested by the Participant, transmitting the Curriculum Vitae (CV) to sponsors and financial institutions, to access any financial backing for enrollment into the course	<p>6.1.b Contract – executing a request from the data subject</p> <p><u>Storage period</u> <i>Data will be processed for 1 year after the end of the course.</i></p>
i) if applicable and contracted, transmitting the data related to the participation in the course to any sponsors, companies and entities that have funded even partially the cost to enroll in the course	<p>6.1.b-c Contract - Legal obligation, fulfillment of contractual services</p> <p><u>Storage period</u> <i>Data will be processed for 6 months after the end of the course.</i></p>
l) defining the data subject's preferences, also for profiling and marketing purposes	<p>6.1.a Consent</p> <p><u>Storage period</u> <i>Data will be processed for 5 years and then only in anonymized form for statistical purposes.</i></p>
m) promoting educational initiatives and events	<p>6.1.a Consent</p> <p><u>Storage period</u> <i>Data will be processed until consent is revoked.</i></p>
n) promoting the diffusion of knowledge and experiences through newsletters, publications and communications about courses, events, and other knowledge diffusion initiatives	<p>6.1.a Consent</p> <p><u>Storage period</u> <i>Data will be processed until consent is revoked.</i></p>


	<p>CHARACTERISTICS OF THE PROCESSING AND CONSEQUENCES IN CASE OF NON-CONSENT</p>
	<p>Data will be processed both on paper and electronically, manually and/or with electronic or automated tools. The Data Controller has a CRM tool to improve user engagement through a profiling system aimed at improving the</p>


	<p>effectiveness of communications, allowing the data subject to receive information related to their interests.</p> <p>Data related to participant enrollment is stored in the CRM until the purposes pursued are achieved, or for the required period of time to ensure that enrollment in educational initiatives is managed correctly.</p> <p>Data related to participants is stored in the CRM until consent for sending informative communications and news about MIP's events and initiatives is withdrawn and used for profiling and marketing purposes for 5 years.</p> <p>The non-provision of data referable to legal and/or contractual requirements may result in the inability to provide the educational services.</p>
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	RECIPIENTS AND SCOPE OF DIFFUSION
	<p>Bearing in mind that communication to third parties does not exempt the latter from providing their privacy information and lawfully processing the data only by virtue of a valid legal basis, it should be noted that, except for communications to parties whose right to access the personal data is recognized by law provisions and/or orders of Public Authorities, or, in case of funded projects, with the exception of communications to the entities in charge of disbursement of contributions, control or certification entities, the personal data may be communicated only to: Politecnico di Milano; any partners conducting educational activities; recruitment companies, companies and professionals interested in hiring staff; insurance and brokerage companies and their experts; professionals, companies and institutions at which educational, seminar and supplementary activities held outside MIP will take place; service providers.</p> <p>Data provided by the Participants for the preparation of the Profile Book (publication containing the profiles of the Participants) and the Curriculum Vitae, if necessary for the formative event, may be communicated or disclosed to companies, institutions and also to other participants of the same event.</p> <p>If the Participant is the recipient of disbursements and donations (e.g., scholarship to cover all or part of the cost of enrollment), personal data relating to the Participant and their participation to the course may be disclosed to the parties who provided those disbursements and donations.</p>

	SUBJECTS WITH AN ACTIVE ROLE DURING THE PROCESSING ACTIVITIES
	<p>Personal data may be processed by those qualified as Data Processors pursuant to Articles 4.8 and 28 GDPR (e.g., faculty, business testimonials, professionals, lawyers, accountants, consulting and service companies, hardware and software support companies) as well as by parties authorized to process the data pursuant to Article 29 GDPR, operating under the direct authority of the Data Controller (employees, faculty, and or collaborators in various capacities), who have instructed them in this regard.</p>

TRANSFERS OF PERSONAL DATA TO THIRD COUNTRIES	
	<p>The Data Controller uses Cloud services offered by identified providers, appropriately qualified as Data Processors, operating in Europe or countries for which there are adequacy decisions by the European Commission and/or the Supervisory Authority.</p> <p>Regarding the transfer of personal data to the United States, prior to any transfer and in light of the circumstances, it will be assessed on a case-by-case basis that the level of data protection and related security measures are adequate and effective.</p> <p>In the absence of an adequacy decision or adequate safeguards pursuant to Article 46 GDPR or binding corporate rules pursuant to Article 48 GDPR, the transfer will take place only with the explicit, specific and informed consent of the data subject pursuant to Article 49 GDPR on the possible risks arising from the transfer of personal data (lack of adequate safeguards in order to protect the data).</p>

RIGHTS OF DATA SUBJECTS (ARTICLES 15-22 GDPR)	
	<p>Pursuant to Articles 15 to 22 of the GDPR, the data subjects have the right to obtain confirmation that personal data concerning them is being processed, the origin, purposes and methods of processing, updating, rectification, integration as well as erasure of data processed in violation of the law or if one of the conditions indicated in Article 17 of the GDPR are applicable. The data subjects also have the right to lodge a complaint with a supervisory authority if they believe the rights indicated herein have not been recognized. To exercise your rights, you can contact the Data Controller by writing to MIP Politecnico di Milano Graduate School of Business ScpA based in Via Lambruschini 4C, Building 26/A - 20156 Milano, or by sending an e-mail to privacy@gsom.polimi.it. The Data Controller has appointed a Data Protection Officer, who can be reached at the following email address: dpo@gsom.polimi.it.</p>

ADDITIONAL PURPOSES	
	<p>If the Data Controller intends to further process personal data for a purpose other than that for which it was collected, the Data Controller undertakes, prior to such further processing, to provide the data subject with information regarding that other purpose and any additional relevant information.</p>