






Information required by EU Regulation 2016/679 (GDPR)

PREMISE
<p>MIP Politecnico di Milano - Graduate School of Business Consortium Company with Share Capital (below "MIP") considers the protection of personal data to be of fundamental importance, ensuring that its processing is conducted in full compliance with the protections and rights recognised in <i>EU Regulation 2016/679</i> (hereinafter the "<i>Regulations</i>" or "<i>GDPR</i>") and by the further national and Community regulations as well as the Provisions of the Guarantor Authority.</p> <p>The processing of personal data by MIP is based on the principles of lawfulness, correctness and transparency and uses the minimum set of data for the period of time strictly necessary. MIP processes data which is as accurate and up-to-date as possible, preserving its security.</p> <p>As foreseen by the GDPR, in accordance with the principle of transparency, the following information shall be provided to the users of the FLEXA service.</p>


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


	SOURCE AND TYPE OF PERSONAL DATA PROCESSED
	<p>FLEXA is a service that enables the development of skills and knowledge and, to this end, uses data collected directly from the data subject when the contract is signed, as part of the assessment process or during the use of the platform.</p> <p>It is possible that personal data governed by art. 9 of the GDPR (<i>processing of special categories of personal data</i>)¹ may be acquired. The treatment, however, responds to the principle of data minimisation and conservation limitation: the minimum set of data will be processed for the period strictly necessary. The personal data processed includes the following:</p> <ul style="list-style-type: none"> • personal and tax details; • contact details (domicile, mobile phone, telephone, e-mail); • details of bank or post office account or credit card; • data relating to the academic record and professional training; • data relating to racial or ethnic origin, aspirations and beliefs, or related to health; • data relating to the use of the platform.


¹ Art. 9 of GDPR "*racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation*".


 PURPOSE	LEGAL BASIS	NOTES & RETENTION TIMES
Accounting and administrative management of the Contract	6.1.c) Legal obligation	<p>The data is processed to meet the legal obligations relating to the keeping of accounting records and to the fulfilment of related tax obligations.</p> <p>The data is stored for ten years.</p>
Provision of the FLEXA Service	6.1.b) Execution of a Contract	<p>The data is processed to provide the service requested by the user and specified in the Terms & Conditions.</p> <p>The data is kept for a period of 3 months from the expiry of the contract and subsequently anonymised.</p> <p>The presence of a retention period following the expiry of the contract is linked to the possibility that the user may decide to rejoin the service. In fact, after this period, the data will no longer be recoverable.</p>
Communication of platform usage data	6.1.b) Execution of a Contract	The data on the use of the service by users is communicated to the signatory to the contract.
Profiling	Consent 6.1.a)	<p>MIP designs and delivers high-level training in different areas and promotes the dissemination of knowledge and experience at managerial level. The expression of consent by the user allows the Data Controller to understand the interests of the user. The latter can be derived from the analysis of preferences, habits and behaviours related to the use of the platform and the data provided or in possession of MIP.</p> <p>The data will be processed until the revocation of consent for this purpose.</p>
Promote training initiatives, publications, events and initiatives to disseminate knowledge	6.1.a) Consent	<p>The expression of consent by the user allows the Data Controller to promote training and dissemination of knowledge to the user.</p> <p>The data will be processed until the revocation of consent for this purpose.</p>
Allow companies/institutions to carry out targeted searches in the context of the selection of their personnel.	6.1.a) Consent	<p>The expression of consent by the user allows companies and institutions to extract lists of potential employees based on predefined parameters (Age, Degree, Industry, ...).</p> <p>The data will be processed until the revocation of consent for this purpose.</p>
The exercise of a right in legal proceedings for the defence of the interests of the Data Controller (protection of assets and corporate resources; need to identify specific responsibilities for violations of law or fraudulent	(Art. 6.1.f) Legitimate interest of the Data Controller	<p>This practice may also involve analysis of backup copies of the data in order to ascertain precise responsibilities for violations of law or inappropriate and/or fraudulent behaviour.</p> <p>The data is kept for the maximum time provided for by the applicable legal provisions on the subject of the limitation of rights and/or expiry of the action and, in general, for the exercise/defence of the rights of the Data Controller in disputes brought by public</p>

<i>behaviour; compliance with contractual obligations;..)</i>		<i>authorities, subjects/public bodies and, in any case, for the entire duration of the judgment in every phase and degree.</i>
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	OBLIGATION CONCERNING DATA SUBMISSION
<p>Most of the data is collected and processed by virtue of contractual clauses or legal obligations and, only for profiling and sending promotional communications, the user's consent is required.</p> <p>The absence of consent will simply result in the impossibility of obtaining targeted communications (in the case of lack of consent to profiling) or even general promotional communications (in the case of refusal of consent for marketing purposes).</p>	

	RECIPIENTS AND DIFFUSION
<p>Without prejudice to communications and dissemination carried out in the execution of contractual obligations, those arranged by orders of the authorities or provided for by the law, premising that communication to third parties does not exempt them from providing information and requesting consent to the processing, it is specified that the data may be communicated to third parties, as follows:</p> <ul style="list-style-type: none"> • To banks and credit institutions, Post Offices, and issuers of credit/debit cards for the management of the transaction; • To insurance companies, insurance brokers and expert assessors in cases of casualty or accident; • To control bodies and supervisory authorities, tax offices, public safety authorities; • Each user has the freedom to participate in virtual competitions (Business Challenges), sponsored or otherwise, that allow groups of users to compete. The participants in the Business Challenge and any sponsors will see the contact details and the evolution of the competition; • Users can participate in specific communities to discuss specific themes, in which case the contact details of the participants in the community will be shared with the other members; • Companies and institutions that are looking for personnel. <p>Users can decide whether and which personal characteristics to make visible to companies and entities registered on the platform.</p>	

	SUBJECTS WITH AN ACTIVE ROLE IN PROCESSING
<p>The data may be processed by persons designated as Data Processor under GDPR Art. 4.8 and 28 (professionals, lawyers, accountants, consultancy and service firms, hardware and software service and support companies, ...) and by persons authorised to process data pursuant to Art. 29, who operate under the direct authority of the Data Controller (employees, lecturers and/or collaborators in various capacities), whom he has instructed in this sense.</p>	

	TRANSFER OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EUROPEAN UNION
<p>The Data Controller will use Cloud services offered by several vendors who are suitably qualified as Data Processors and operate in Europe or in the United States or, in any case, in the countries for which there is an adequacy decision by the European Community.</p> <p>With regards to the United States, data transfer is permitted under the Privacy Shield, a self-certification framework that became effective in Italy on 01 August 2016 for US-based companies that wish to receive personal data from EU countries. Participating companies undertake to respect the principles contained</p>	

therein and to provide the European data subjects with adequate means of protection, or else be removed from the "Privacy Shield List" (which can be found at www.privacyshield.gov) by the US Department of Commerce, and additionally they may be subject to penalties imposed by the Federal Trade Commission. Among the companies on the list are the main suppliers of Cloud services.



DATA SUBJECT RIGHTS (GDPR Arts. 15-22)

Data subjects have the right to be informed by the Data Controller whether or not personal data relating to them is being processed and, potentially, request access to, rectification and deletion of their personal data, or to limit the purposes of the processing of data concerning them or to oppose their processing - if this is not required by law - in addition to exercising their right to data portability.

At any time, the data subject has the right to withdraw his or her consent, without this affecting the lawfulness of the processing undertaken on the basis of consent given before this was withdrawn.

Every data subject also has the right to lodge a complaint with the supervisory authorities.



PROFILING

At MIP, with regard to the users of the FLEXA service who have given their free consent, profiling processes are put in place to derive the interests of the user through the analysis of preferences, habits and behaviours related to the use of the platform and the data provided or in possession of MIP.



ADDITIONAL PURPOSES

In the case that the Data Controller wishes to process your personal data further for a purpose other than that for which it was collected, before that further processing can take place, the Data Controller undertakes to provide the data subject with further information and to request further consent (if envisaged as the legal basis) regarding the different purpose and any further relevant information.