





## Information required under the General Data Protection Regulation (EU) 2016/679 (GDPR)

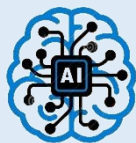
<b>PREMISE</b>	
<p><b>MIP Politecnico di Milano - Graduate School of Business Consortium Company with Share Capital</b> (hereafter "<b>MIP</b>") considers the protection of personal data to be of fundamental importance, ensuring that they are processed in full compliance with the protections and rights recognised in <i>EU Regulation 2016/679</i> (hereafter the "<i>Regulations</i>" or "<i>GDPR</i>") and by the further national and European Community regulations, as well as the provisions issued by the Italian Data Protection Authority (known as Garante). In processing personal data, MIP will apply the principles of lawfulness, fairness and transparency, and use the minimum set of data for the time strictly necessary. MIP processes data which are as accurate and up-to-date as possible, preserving their security. As set out in the GDPR and in accordance with the principle of transparency, the following information is provided to all users of the FLEXA service.</p>	

	<p><b>Data Controller</b></p> <p><b>POLIMI GRADUATE SCHOOL OF MANAGEMENT</b></p>	<p><b>MIP Politecnico di Milano – Graduate School of Business, SCpA</b> Via Lambruschini 4C – Building 26/A 20156 Milano Tel: +39 02 23992820, Fax: +39 02 23992844 email: <a href="mailto:privacy@mip.polimi.it">privacy@mip.polimi.it</a></p>
	<p></p> <p><b>Data Protection Officer (DPO)</b></p>	<p><b>Data Protection Officer</b> c/o MIP Politecnico di Milano Tel: +39 02 23992820, email: <a href="mailto:dpo@mip.polimi.it">dpo@mip.polimi.it</a></p>

 <b>SOURCE AND TYPE OF PERSONAL DATA PROCESSED</b>	
<p>FLEXA ("the <b>Platform</b>") is a service that enables users to develop their skills and knowledge and, to achieve this purpose, uses data collected directly from data subjects when they sign the Platform agreement and/or as part of their assessment process and/or during their use of the Platform.</p> <p>MIP's data processing complies with the principle of data minimisation and storage limitation, identifying the minimum set of data needed and processing such data only for the period strictly necessary.</p> <p>As a data subject, your personal data processed by MIP include the following:</p> <ul style="list-style-type: none"> <li>• Personal details</li> <li>• Contact details (i.e. mobile phone numbers, email addresses, social media profiles)</li> <li>• Data relating to your CV, academic record and professional training</li> <li>• Data relating to the purposes/uses of the Platform.</li> </ul>	

 <b>PURPOSE</b>	<b>LEGAL BASIS</b>	<b>NOTES AND RETENTION TIMES</b>
To provide the FLEXA Service	6.1.b) Execution of a Contract	<p>Data are processed to provide the service that you requested and which is set out in the Terms &amp; Conditions.</p> <p><b>If you should no longer access the Platform, your data will be kept for up to 36 months from the last time you accessed the Platform and will subsequently be anonymised.</b></p>
For profiling purposes	6.1.a) Consent	MIP designs and delivers high-level training in different areas and promotes the dissemination of

		<p>manager level knowledge and experience. By giving your consent to your data being processed, the Data Controller can understand your areas of interest. These can be deduced by analysing your preferences, habits and behaviour when you use the Platform and from data provided by MIP or in its possession.</p> <p><b>The profiling process examines a five-year period.</b></p>
To promote MIP's training initiatives, publications, events and programmes to disseminate knowledge through newsletters, direct emailing and display advertising	6.1.a) Consent	<p>By giving your consent to your data being processed, the Data Controller can process your personal data for the required purposes.</p> <p><b>Your data will be processed for a period of five years from the last time you gave your consent.</b></p>
To enable networking between Platform users, in order to promote and facilitate the sharing of knowledge and experiences	6.1.a) Consent	<p>By giving your consent to your data being processed, other users can access your personal data for networking and to share knowledge.</p> <p><b>Your data will be processed for networking purposes for a period of five years from the last time you gave your consent.</b></p>
To exercise a right in legal proceedings to defend the interests of the Data Controller (protection of assets and corporate resources, need to identify specific responsibilities for breaches to the law or fraudulent behaviour, compliance with contractual obligations..)	6.1.f) The Data Controller's legitimate interests	<p>This practice may also involve analysing backup copies of data to ascertain precise responsibilities for breaches to the law or inappropriate and/or fraudulent behaviour.</p> <p><b>Your data are kept for the maximum time allowed under the applicable law on the subject of the limitation of rights and/or expiry of the action and, in general, for the Data Controller to exercise its rights in disputes brought by public authorities, public subjects/bodies and private subjects and, in any case, for the entire duration of the judgment in every phase and degree.</b></p>



#### ALGORITHM LOGIC

After completing an assessment of your hard, soft and digital skills, an algorithm is used to measure the gap between your assessment value and the ideal value for each skill, which depends on the role and functions you selected during the onboarding phase. The critical skills you require are then identified and the Platform proposes a learning pathway.



#### OBLIGATIONS CONCERNING THE PROVIDING OF DATA

Most data are collected and processed on the basis of contractual clauses or legal obligations and, your consent is required only for profiling and to send you promotional material.

If you do not give your consent:

- It will be impossible for MIP to profile you and send you targeted communications based upon your preferences.
- It will be impossible for MIP to send you general promotional material.
- It will be impossible for you to establish contact with other Platform users for networking purposes.



#### RECIPIENTS AND DIFFUSION

Without prejudice to communication and dissemination initiatives carried out in the execution of contractual obligations, or obligations ensuing from orders by the authorities or set out in law, on the premise that communications sent to third parties does not exempt the latter from providing information or requesting your consent for your data to be processed, MIP specifies that your data may be communicated to third parties under the following circumstances:

- To Supervisory Bodies and Authorities and Public Safety Authorities if they make such a request.
- Users can take part in virtual competitions (Business Challenges), which may or may not be sponsored, where users in teams compete against each other. Business Challenge participants and potential sponsors will have access to your contact details and will be able to view the progress of the competition.
- Users can join specific communities to discuss topics of interest, and the participants' contact details will be shared with the other community members.
- To companies and organisations for recruiting purposes.

You, as all other users, can decide whether and which pieces of personal data you wish to make visible to companies and organisations registered on the Platform.



### ***SUBJECTS WITH AN ACTIVE ROLE IN THE PROCESSING***

Your data may be processed by persons designated as Data Processors 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 it has instructed in this sense.



### ***TRANSFER OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EUROPEAN UNION***

The Data Controller will use Cloud services offered by vendors who are suitably qualified as Data Processors. This may result in data being transferred to countries outside the European Union, but only:

- towards Countries that have been approved through an adequacy decision taken by the European Commission or the Italian Data Protection Authority (GDPR Art. 45),
- to countries outside the European Economic Area (EEA), after first putting in place standard contractual clauses adopted/approved by the European Commission pursuant to Art. 46, 2. c) and d). In this event, you can obtain a copy of the guarantees as per Art. 46, par. 2. c) and d) adopted by the Data Controller by sending an email to the DPO,
- towards subjects that have an international structure and have set up, at group level, appropriate binding corporate rules, as per GDPR Art. 47,

provided that the data subject has given his or her explicit consent, in execution of a contract or of pre-contractual measures, to establish or defend a right in court, or to protect the vital interests of a data subject or those of other persons in the event that the data subject cannot give his or her consent (GDPR Art. 49).



### ***DATA SUBJECT RIGHTS (GDPR Arts. 15-22)***

You, as data subject, 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, you have the right to withdraw your consent, without this affecting the lawfulness of data processing undertaken on the basis of your consent given before such consent was withdrawn.

You, as every data subject, also have the right to lodge a complaint with the supervisory authorities.



### ***PROFILING***

MIP has put in place profiling processes to detect the users' areas of interest by analysing their preferences, habits and behaviour relating to the use of the Platform and data provided by MIP or in its possession. Such profiling applies solely to FLEXA service users who have freely given

	their consent for their personal data to be processed.
	<b><i>ADDITIONAL PURPOSES</i></b>
	In the event 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 you, as the data subject, with further information and to request your further consent (if this is the legal basis) for the different purpose and for any further relevant information.

**Information on the processing of personal data of users of the site,  
pursuant to Article 13 of (EU) Regulation 2016/679**



***PREMISE***


Pursuant to (EU) Regulation 2016/679 (hereinafter referred to as "Regulation" or "GDPR"), this page describes how to process the personal data of users who consult the website which **MIP Politecnico di Milano - Graduate School of Business S.C.p.A.** (hereinafter, "MIP") has provided for the delivery of the **FLEXA** service.


This information does not relate to other sites, pages or online services accessible via hypertext links that may be published on the sites but refer to resources external to the domain <https://knowledgeamplified.it/>.

Following consultation of the site, data of *data subjects* may be processed, i.e. data relating to identified or identifiable individuals, and this entails the need, for those who decide on the purposes and methods of processing ("*Data Controllers*"), to respond to certain obligations, including informing data subjects and obtaining consent, where the latter constitutes the legal basis for processing.


Given that the processing will be based on the principles of legality, correctness and transparency, minimisation and limitation of data retention, accuracy, integrity and confidentiality, in light of the above, MIP provides you with the following information.

	<p align="center"><b><i>Data Controller</i></b></p> <p align="center"><b>POLIMI GRADUATE SCHOOL OF MANAGEMENT</b></p>	<p><b>MIP Politecnico di Milano - Graduate School of Business, SCpA</b> Via Lambruschini 4C - Building 26/A 20156 Milan, Italy Tel: +39 02 2399 2820 Fax: +39 02 2399 2844 Email: <a href="mailto:privacy@mip.polimi.it">privacy@mip.polimi.it</a></p>
	<p align="center"><b><i>Data Protection Officer (DPO)</i></b></p>	<p><b>Data Protection Officer</b> c/o MIP Politecnico di Milano Tel: +39 02 2399 2820 email: <a href="mailto:dpo@mip.polimi.it">dpo@mip.polimi.it</a></p>

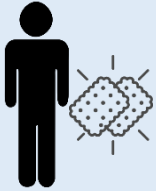
	<p><b><i>DATA PROVIDED VOLUNTARILY BY THE USER</i></b></p> <p>The optional, explicit and voluntary sending of messages to the MIP contact addresses, as well as the completion and forwarding of the forms available on the site involve the acquisition of the sender's contact details necessary to respond to requests, and any personal data included in the communications.</p> <p>Specific information is published on the pages prepared for the provision of certain services.</p>
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	<p><b><i>NAVIGATION DATA</i></b></p> <p>During their normal operation, the IT systems and software procedures used to operate this site acquire some personal data whose transmission is implicit in the use of Internet communication protocols.</p> <p>This category of data includes the following:</p> <ul style="list-style-type: none"> <li>• IP addresses of devices used by users;</li> <li>• date and time when the request was received;</li> <li>• the addresses in URI/URL (Uniform Resource Identifier/Locator) notation of the requested resources;</li> <li>• the numerical code indicating the state of the response given by the server (successful, error, etc);</li> <li>• the byte size of the response;</li> <li>• URI/URL address of the source page (referrer);</li> <li>• browser identification string (user agent).</li> </ul>
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	<p>This data does not persist for more than 15 days, after which it is automatically deleted (without prejudice to any need for the judicial authority to establish criminal offences). Furthermore, data necessary for the use of web services is processed anonymously in order to check the proper functioning of the services offered.</p>
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	<p><b>COOKIES</b></p> <p>Cookies are text strings created by a server and stored on the hard disk of the computer or on any device used to access the Internet (smartphones, tablets, etc.) which are then reconsidered in subsequent Internet accesses by the same device. Cookies enable information to be collected about a user's navigation on a site, for example to remember their language preferences or the currency used for a purchase, and propose it again on the next visit in order to facilitate the use of the site and improve the user experience. Cookies can be permanently stored on the user's computer and may have a variable duration (so-called persistent cookies) or may even disappear upon the closing of the browser or have a limited duration (so-called session cookies). Cookies can be installed by the site that the user is visiting (so-called first-party cookies) or can be installed by other websites (so-called third-party cookies).</p> <p>The FLEXA website uses first-party cookies, third-party cookies, and other similar technologies, as described below.</p> <p><u>Technical cookies for navigation and functionality:</u> (legal basis of the processing: consent) these are first-party cookies, both session and persistent, aimed at allowing safe and efficient navigation and use of the pages of the site, and to improve the services rendered. These cookies, for example, allow the recognition of the selected language and the country from which the connection takes place. These cookies recognise you when you log in again, avoiding the need for you to re-enter your details each time, and improve the navigation experience.</p> <p><u>Profiling cookies:</u> (legal basis of the processing: consent) profiling cookies allow you to record the preferences detected during each visit and thus create profiles that allow messages that are more in line with the user's preferences and interests to be sent, for example, by allowing you to view the products the user is looking for faster, or to offer them content that is in line with their preferences. The FLEXA website also uses third-party profiling cookies to display MIP proposals to the user when they visit other sites (retargeting). There is also a first-party cookie on the site designed to allow the operation of a marketing automation platform aimed at targeting users of the site in such a way as to create appropriate content with which the data controller may undertake marketing campaigns, monitor their progress and create opportunities for their users.</p> <p><u>Analytical cookies:</u> (Legal basis of processing: consent) MIP uses Google Analytics from Google, Inc. (hereinafter "Google") to generate statistics on the use of the website (for example, on the use of the services, most visited pages, number of visitors hourly or daily, geographical areas of origin, etc.) Google Analytics does not collect personal data to carry out these activities, as all user IP addresses are anonymised as soon as they are received from the network and before being stored or processed.</p> <p>The user can disable Google Analytics cookies by downloading a specific browser plug-in here: <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>.</p> <p><u>Social Cookies:</u> third-party cookies are used on the sites to allow users to interact with social networks (Facebook, Twitter, ...) and in particular to share content from the sites through the same social networks.</p> <p>When any page of the site is accessed, there is a banner that contains a short notice. By closing the banner or continuing to navigate, accessing another area or selecting an item on the page (for example, an image or a link), you consent to the use of cookies. Your consent to the use of cookies is registered.</p> <p>Technical navigation and functionality cookies and analytical cookies are retained for the duration of the browsing session on the site and, if persistent, also later, while the profiling cookies are stored until the withdrawal of consent for this purpose, which occurs with the deletion of the profiling cookies from the browser cache.</p>

	The following table shows the cookies managed by the site and indicates the terms of storage, after which, cookies will be deleted or made anonymous, in accordance with the technical procedures of cancellation and backup.
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	<b>THIRD-PARTY COOKIES</b>
	<p>By visiting a website you can receive cookies from sites managed by other organisations ("third parties"). As far as sites are concerned, third-party cookies are requested by widgets for the use of services offered by third-party sites: google calendars, google maps, embedding of videos uploaded to the YouTube platform, embedding of audio files uploaded to the Spreker platform.</p> <p>The management of personal data collected by third parties is governed by the relevant information available on the respective websites:</p> <ul style="list-style-type: none"> <li>• Spreker: <a href="https://www.spreker.com/privacy">https://www.spreker.com/privacy</a></li> <li>• YouTube: <a href="https://support.google.com/youtube/answer/2801895?hl=it">https://support.google.com/youtube/answer/2801895?hl=it</a></li> <li>• Google: <a href="https://policies.google.com/technologies/product-privacy?hl=it">https://policies.google.com/technologies/product-privacy?hl=it</a></li> </ul>

	<p>For institutional pages, Facebook offers a variety of analytical tools from which to draw aggregate data that helps to understand how people interact. Facebook then receives data from subjects who view the MIP and Politecnico Facebook pages who would otherwise not interact with social media.</p> <p>With regard to the processing of the statistical data of their respective Facebook pages, MIP and Facebook Ireland Limited ("Facebook Ireland") are joint controllers.</p> <p>Similarly, with regard to the inclusion of the Facebook "like" button on the pages of the site that allows users to share their preferences on social networks, MIP and Facebook Ireland Limited must also be considered "joint controllers" for data collection operations, not for post-collection processing operated by Facebook Ireland Limited.</p> <p>At this <a href="#">link</a> you can consult the appendix on the data processing controller for Insights Data on the Facebook page, which indicates the division of responsibilities of Facebook Ireland and MIP or Politecnico, each as administrator of their respective Facebook page.</p> <p><a href="#">On this page</a> you can consult the Facebook policy statement and find, among other items, the following information:</p> <ul style="list-style-type: none"> <li>• What types of information Facebook collects;</li> <li>• How Facebook uses such information;</li> <li>• How this information is shared;</li> <li>• The legal bases for data processing;</li> <li>• How to exercise the rights provided by the GDPR;</li> <li>• Facebook Ireland's contact details for personal data protection issues;</li> <li>• The contact details of the Data Protection Officer for Facebook Ireland;</li> <li>• Facebook visitor rights under the GDPR;</li> <li>• The retention period of the data;</li> </ul> <p><a href="#">On this page</a> you can consult the Facebook Ireland Cookie Policy</p>
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	<b>DATA SUBJECT RIGHTS (GDPR ARTS. 15-22)</b>
	<p>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.</p> <p>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.</p> <p>Every data subject also has the right to lodge a complaint with the supervisory authorities.</p>



	<p>Data subjects can also oppose the registration of cookies on their hard disk by configuring the browser to disable them.</p> <p>Below are the links where information can be found on the methods offered by the main browsers:</p> <ul style="list-style-type: none"> <li>• <u>Internet Explorer</u>: <a href="http://windows.microsoft.com/it-it/windows7/how-to-manage-cookies-in-internet-explorer-9">http://windows.microsoft.com/it-it/windows7/how-to-manage-cookies-in-internet-explorer-9</a>;</li> <li>• <u>Microsoft Edge</u>: <a href="https://support.microsoft.com/it-it/help/4027947/windows-delete-cookies">https://support.microsoft.com/it-it/help/4027947/windows-delete-cookies</a>;</li> <li>• <u>Chrome</u>: <a href="https://support.google.com/chrome/answer/95647?hl=it">https://support.google.com/chrome/answer/95647?hl=it</a>;</li> <li>• <u>Firefox</u>: <a href="https://support.mozilla.org/it/kb/Gestione%20dei%20cookie">https://support.mozilla.org/it/kb/Gestione%20dei%20cookie</a>;</li> <li>• <u>Safari</u>: <a href="http://support.apple.com/kb/HT1677?viewlocale=it_IT">http://support.apple.com/kb/HT1677?viewlocale=it_IT</a>;</li> </ul> <p>After this operation, however, some web page functions may not be performed correctly.</p>
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Last update: June 2020