



**Politecnico
di Torino**

PRIVACY POLICY for participation in the “Survey on Home-University Commuting within the Politecnico di Torino community” (Art. 13 of the General Data Protection Regulation – Regulation (EU) 2016/679)

In accordance with Article 13 of EU Regulation 2016/679, the following information is provided, in compliance with the principle of transparency, to make you aware of the characteristics and methods of processing personal data for the purpose of participating in the survey "Survey on Home-University Commuting within the Politecnico di Torino community."

The survey aims to collect information and data to draft the Commuting Plan (PSCL), a document required by Article 229, paragraph 4, of Decree-Law No. 34 of May 19, 2020, converted, with amendments, by Law No. 77 of July 17, 2020. This article is directed at employees of businesses and public administrations with the aim of reducing the use of individual private transportation. The objective of the regulation is, therefore, to **enable the structural and permanent reduction of environmental impact resulting from vehicular traffic in urban and metropolitan areas**, promoting the implementation of interventions in the organization and management of people's mobility demands to reduce the use of individual motorized private transportation in systematic home-to-work commutes and promote the decongestion of vehicular traffic.

According to Ministerial Decree No. 179 of May 12, 2021, Article 3, paragraph 5, the document "Guidelines for the drafting and implementation of home-work commuting plans (PSCL)" was adopted. It requires the preparation of an informative and analytical section that **gathers all information and data related to the mobility needs of personnel**. In particular, the document indicates the need to produce an "Analysis of structural company conditions and transport supply" and an "Analysis of home-work commuting."

In order to ensure this objective in accordance with the provisions of Law No. 221 of 2015, the University deems it appropriate to extend the request for information to students with their prior consent.



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Since 2022, the Politecnico di Torino joins the INITIATIVE TO SUPPORT CORPORATE OR SCHOOL MOBILITY MANAGERS WITH FREE ACCESS TO THE EMMA PLATFORM (Electronic Mobility Manager Application), activated by the Metropolitan City of Turin and the Piedmont Region in collaboration with 5T srl.

CONTACTS

The **Data Controller** is Politecnico di Torino, represented by the Rector pro tempore as legal representative, with statutory seat in Corso Duca degli Abruzzi, n. 24, 10129 – Turin.

You can contact the Data Controller at: politecnicoditorino@pec.polito.it (certified e-mail) For further information and inquiries write to: privacy@polito.it

You can contact the **Data Protection Officer** (DPO) of Politecnico di Torino for inquiries on the processing of your personal data and your rights at: dpo@polito.it; dpo@pec.polito.it (certified e-mail).

PRICIPLES, LEGAL BASIS AND PURPOSES OF THE PROCESSING OF PERSONAL DATA

The personal data requested includes, for example, residence and gender.

In accordance with the principles of legality, fairness, transparency, adequacy, relevance, and necessity as per Article 5, paragraph 1, of the GDPR, the Politecnico di Torino, as the Data Controller, will process the personal data acquired for the following purposes:

Description	Legal Basis	
- Analysis of the structural conditions of the University and	- Art. 6, paragraph 1, letter: a) ["the data subject has given consent to the processing of their personal data for one or	Student



transportation supply - Analysis of home-work commuting - (possible) retention of the responses provided in the previous survey	more specific purposes"] of the GDPR ;	
	- Art. 6, paragraph 1, letter: - o c) ["processing is necessary for compliance with a legal obligation to which the controller is subject;"] of the GDPR; - o e) ["processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"] of the GDPR; - o (Possible saving of the responses) a) ["the data subject has given consent to the processing of their personal data for one or more specific purposes"] under the GDPR	Employee

AUTHORIZED PROCESSORS, RECIPIENTS, OR CATEGORIES OF RECIPIENTS, AND DATA PROCESSORS

The data processed for the above purposes will be communicated or made accessible to individuals identified by the Politecnico di Torino, who will be appropriately instructed by the Data Controller.

The management and storage of personal data collected by the Politecnico di Torino occur on systems located within the University and/or external systems of service providers necessary for technical and administrative management. These providers may become aware of the personal data of the individuals and will be duly appointed as Data Processors under Article 28 of the GDPR.



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Part of the data will be communicated and processed by the Metropolitan City of Turin, the Piedmont Region, and 5T srl.

DATA TRANSFER

The collected data will not be transferred to a country outside the European Union (a third country) unless guaranteed by adequacy decisions of the European Commission or carried out in a manner providing appropriate and suitable guarantees under Articles 46 or 47 or 49 of the GDPR.

DATA RETENTION PERIOD

The provided personal data will be stored in accordance with the principles of Article 5 of the GDPR for a period not exceeding the achievement of the initiative's purposes or for longer periods if processing is necessary for archival purposes in the public interest, for statistical purposes, for defense in legal proceedings, or for the exercise of actions to protect rights.

RIGHTS OF THE DATA SUBJECT

The data subject has the right to request from the Data Controller, in accordance with Articles 15 and onwards of the GDPR:

- Access to their personal data and all information under Article 15 of the GDPR.
- Rectification of inaccurate personal data and completion of incomplete data.
- Deletion of personal data, except for data contained in documents that must be obligatorily retained by the University, unless there is a prevailing legitimate reason for processing.
- Restriction of processing in cases under Article 18 of the GDPR.

The data subject also has the right to object to the processing of personal data, subject to the necessity and obligation of data processing to conclude the initiated procedure.



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If the data subject wishes to exercise any of these rights, they can contact the Data Controller.

COMPLAINT

The data subject has the right to contact the Italian Data Protection Authority (Garante per la protezione dei dati personali) using the methods indicated at the following link: <https://www.garanteprivacy.it/home/docweb/-/docweb-display/docweb/4535524>

Upon acquiring the above information, it is reminded that participation in the survey means:

- Understanding and accepting the privacy policy;
- Giving consent, if you are a student, to the processing of personal data for the purposes and in the manner described in this privacy policy;
- Giving consent, if you are an employee, to the processing for the purposes and in the manner indicated therein (retention of previously provided responses).