

PRIVACY POLICY FOR THE COLLECTION AND PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF EU REGULATION NO. 679/2016 OF 27 APRIL 2016

This privacy policy is issued pursuant to art. 13 of EU Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and in compliance with the legislation on the processing of personal data, as well as on the free movement of such data.

This privacy policy applies to the collection of data related to the research "**MUSA – Multilayered Urban Sustainability Action**", funded by the European Union – NextGeneration EU, PNRR Mission 4 Component 2 Investment Line 1.5: Creation and strengthening of "innovation ecosystems", construction of "territorial R&D leaders".

The project involves the recording of personal data during events that investigate the relationship between people and the environment, such as guided walks in an urban or virtual environment.

The research is conducted using the **exp-EIA**® (Experiential Environmental Impact Assessment) method and through access to <https://www.labsimurb.polimi.it/> and <https://www.expeia.eu/> websites, use of the Artefacto *City Sense* application, response to questionnaires, in order to evaluate the environments and propose any changes and improvements to the urban space.

The results of the research may be disseminated in an anonymous and aggregated form through platforms and websites such as <https://www.expeia.eu/> <https://citysense.fr/> www.polimi.it www.unimi.it and related social media channels.

JOINT DATA CONTROLLERS

Politecnico di Milano – Director General delegated by the pro-tempore Rector - contact: dirgen@polimi.it

University of Milan – in the person of the Rector pro tempore, e-mail: infoprivacy@unimi.it

DATA PROTECTION OFFICERS AND POINTS OF CONTACT

Politecnico di Milano - e-mail: privacy@polimi.it - Tel. 02 23999378.

University of Milan - Prof. Pierluigi Perri, c/o Department "Cesare Beccaria", Via Festa del Perdono n. 3, 20122 Milan, e-mail: dpo@unimi.it

PURPOSES OF PROCESSING, LEGAL BASIS, CATEGORIES OF DATA AND RETENTION PERIOD

For the purposes of the application of European and national legislation (EU Reg. 679/2016, hereinafter Regulation), we inform you that your personal data will be used for the following purposes:

Intended purposes of the personal data processing	Legal basis for the processing	Categories of personal data subject to processing	Retention period of personal data
Purpose 1 - Collection of data for registration to the event	<i>Not Applicable in this data collection</i>		
Purpose 2 - Collection of common data during the event and their analysis for the evaluation of the relationship between person and environment	Consent of the data subject (Article 6(1)(a) of the Regulation)	<ul style="list-style-type: none"> • Personal details • Master details 	For a period of 5 years
Purpose 3 - Collection of particular data during the event and their processing for the evaluation of the relationship between the person and the environment	Consent of the interested party (Article 9, paragraph 2, letter a) of the Regulation)	<ul style="list-style-type: none"> • Data revealing ethnic origin • Behavioral data (gyroscope value) • Psychological data (emotional-cognitive and well-being aspects) 	For a period of 5 years
Purpose 4 - Dissemination of the results of the research project	Consent of the data subject (Article 6(1)(a) of the Regulation)	<ul style="list-style-type: none"> • Photo • Video 	For a period of 10 years

We inform you that for the purposes of the processing established, with particular reference to Purposes No. 1 and 2, the interested party may be the subject of filming and audio-video recordings made during the course of the research. Photos and videos (hereinafter, the "Images"), also in partial and/or modified or adapted form, will be processed in full compliance with EU Regulation 2016/679, also with the aid of electronic means, by subjects specifically appointed by the Joint Controllers.

The Images collected will be stored, also in electronic form and on any technological support, for the purposes and within the limits defined above. The use of the images does not entitle you to any compensation.

The provision of personal data referred to in Purposes nos. 1, 2, 3 (including Images) is optional, however the refusal to provide the data will make it impossible for the Joint Data Controllers to carry out the search and, therefore, the impossibility of the interested party to participate in it.

The provision of personal data referred to in Purpose no. 4 (Images) is optional, therefore the refusal to provide data for the purpose of disseminating the results of the research project does not entail the exclusion of the data subject from participation in the research itself.

SPECIAL CATEGORIES OF DATA

For purpose no. 3, the processing of personal data belonging to special categories provided for by art. 9 of the EU Regulation and in detail:

- Data revealing ethnic origin
- Data concerning gender identity
- Behavioral data
- Psychological data

The data in question are processed to achieve the purposes of the research. Behavioral and psychological data serve to investigate the person-environment relationship as a whole. Data revealing ethnic origin and data concerning gender identity are useful to examine the impact of belonging to certain population segments on the perception of places and is, therefore, crucial to gaining an in-depth understanding of the complex relationship between individuals and the environment and to develop more effective and inclusive solutions for the design and management of urban spaces.

The provision of data is optional, however, the refusal to provide the data will make it impossible for the Joint Controllers to carry out the search and, therefore, the impossibility of the interested party to participate in it.

PROCESSING METHODS

For purpose 1, the data will be collected through online platforms. Given that the events will be different and the types of participants in the research activity may be different, the research group reserves the right to use various tools depending on the kind of event carried out, as listed below.

- Microsoft Forms is used under license from the Joint Controllers.
- Google Form allows you to link to informational documents (e.g., privacy documents, photo and video releases) and collect consent digitally. This platform is to be preferred when the registration is not completely anonymous and it is therefore necessary to accept the terms present in the linked documents. Information available at the link <https://policies.google.com/privacy?hl=en>; Eventbrite allows you to manage event registration, ticketing, and attendance management. Information available at the link <https://www.eventbrite.co.uk/help/en-gb/articles/460838/informativa-sulla-privacy-di-eventbrite/>.

For purposes 2 and 3, data are collected pseudo-anonymously through different devices (where physiological data is also provided with wearable devices) and are uploaded anonymously on the websites <https://www.labsimurb.polimi.it/>, <https://www.expeia.eu/>.

The use of the *Artefacto City Sense* application is also envisaged, which transfers data to the Politecnico di Milano and the University of Milan in pseudo-anonymous form. Artefacto S.A.S. is an autonomous Data Controller and its privacy policy is available on the web page <https://www.artefacto-ar.com/regles-de-confidentialite-artefacto/>

For the processing of personal data by the Politecnico di Milano and the University of Milan, adequate technical and organizational security measures have been adopted, such as the storage of data in separate

archives on the OneDrive cloud platform under license from the respective Joint Controllers and the sharing of data through access with authentication to a dedicated Team channel.

Access to the personal data subject to processing is allowed only to duly authorized personnel of the Data Controllers.

CATEGORIES OF RECIPIENTS

In relation to the purposes indicated, the data may be communicated to public and private entities should they collaborate together with the current Joint Controllers as partners in the research project.

The data collected may also be transmitted to service providers necessary to carry out the research, who are formally appointed as Data Processors pursuant to Article 28 of EU Regulation 2016/679 of 27 April 2016.

In detail, the subjects currently recognized as recipients of personal data are the following:

- NOVA LABS S.R.L., Via Camillo Benso Di Cavour 2, 22074, Lomazzo (CO) – IT service provider.
- The University of Strathclyde, Street 16 Richmond Street Postal Code G1 1XQ, Glasgow, United Kingdom
- Adam Architecture Limited (Company registration number 01984723), Old Hyde House, 75 Hyde Street, Winchester, Hampshire, SO23 7DW

The recipients listed above will not have access to the particular data.

TRANSFER TO NON-EU COUNTRIES OR INTERNATIONAL ORGANIZATIONS

Personal data will be processed by the Data Controllers within the territory of the European Union. If, for technical and/or operational reasons, it is necessary to make use of subjects located outside the European Union, or if it is necessary to transfer some of the data collected to technical systems and services managed in the cloud and located outside the European Union, the processing will be regulated in accordance with the provisions of Chapter V of the EU Regulation and authorized on the basis of specific decisions of the European Union. All necessary precautions will therefore be taken in order to ensure the most complete protection of personal data, basing the transfer: a) on adequacy decisions of the recipient third countries expressed by the European Commission; b) on adequate guarantees expressed by the recipient third party pursuant to art. 46 of the EU Regulation; c) on the adoption of binding corporate rules.

RIGHTS OF THE DATA SUBJECTS

As a data subject, you may at any time ask the Data Controllers:

- confirmation of the existence or otherwise of personal data concerning you;
- access to your personal data and information relating to them; the rectification of inaccurate data or the integration of incomplete data; the erasure of your personal data (upon the occurrence of one of the conditions indicated in Article 17, paragraph 1 of the Regulation and in compliance with the exceptions provided for in paragraph 3 of the same article); the restriction of the processing of your personal data (in the event of one of the hypotheses indicated in Article 18, paragraph 1 of the Regulation), the transformation into anonymous form or the blocking of data processed in violation of the law, including those whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed.

As a data subject, you also have the right to object, in whole or in part:

- for legitimate reasons, to the processing of personal data concerning you, even if pertinent to the purpose of the collection.

These rights can be exercised by contacting POLIMI: privacy@polimi.it.

If you believe that your rights have been violated by the Joint Controllers and/or a third party, you have the right to lodge a complaint with the Data Protection Authority and/or other competent supervisory authority pursuant to the Regulation.

CONSENT

By ticking the appropriate box in the online form, the interested party expressly expresses his/her free and full consent to the Processing of Data for the purposes indicated in this policy and to the extent that his/her consent is required for the purposes of the law, as well as to any communication or transfer of data to third parties as indicated in the information itself.

We inform you that as a data subject you have the right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of the processing carried out before the withdrawal on the basis of consent. Consent is revoked as easily as it is granted, by sending a written notice to one of the Joint Data Controllers.

Milan, May 2024