

Privacy policy concerning the ReBone Project

for the collection and processing of personal data pursuant to Articles 13 of Regulation (EU) 679/2016 of 27 April 2016

Introduction

This privacy policy is issued pursuant to Art. 13 of Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and compliance with the legislation on the processing of personal data, as well as the free movement of such data (hereinafter referred to as “GDPR”).

In particular, this privacy policy applies to the recruitment process for the **ReBone** project, which is funded by the European Union within the Programme Horizon Europe, Marie Skłodowska-Curie Actions (G.A. no. 101119884).

The Beneficiaries of the Projects are as follows:

- **Politecnico di Milano (POLIMI)** established in Piazza Leonardo Da Vinci 32, 20133 Milano, Italy;
- **Politecnico di Torino (POLITO)**, established in Corso Duca degli Abruzzi 24, 0129 Torino, Italy;
- **Università degli Studi del Piemonte Orientale “Amedeo Avogadro” (UPO)**, established in Via Duomo 6, 13100 Vercelli, Italy;
- **Université de Liège (ULG)**, established in Place du 20-Août 7, 4000 Liège, Belgium;
- **Lithoz GmbH (LTZ)**, established in Mollardgasse 85A 2 1, 64-69, 1060 Wien, Austria;
- **Ludwig Boltzmann Gesellschaft - Österreichische Vereinigung zur Förderung der wissenschaftlichen Forschung (LBI)**, established in Nussdorfer Strasse 64/6, 1090 Wien, Austria;
- **Paris – Lodron – Universität Salzburg (PLUS)**, established in Kapitelgasse 4-6, 5020 Salzburg, Austria;
- **Faculty of Technology and Metallurgy University of Belgrade (UOB)**, established in Karnegijeva 4, 11120 Belgrade;
- **MedApp Spółka Akcyjna, (MEDAPP)**, established in Armii Krajowej 25, 30-150 Kraków, Poland.

The Associated Partner of the Project are as follows:

- **EU CORE Consulting s.r.l. (EUCORE)**, established in Via XX Settembre 98/E, 00187 Roma, Italy;
- **CERHUM (CERHUM)**, established in Rue des Pôles, 4000 Liège, Belgium;
- **ZNANOST NA CESTI, ZAVOD ZA PROMOCIJO ZNANOSTI, LJUBLJANA (SoS)**, established in Teslova Ulica 30, 1000 Ljubljana, Slovenia;
- **Tampereen Korkeakoulusaatio SR (TAU)**, established in Kalevantie 4, 33100, Tampere, Finland;
- **Université Paris XII Val de Marne (UPEC)**, established in Avenue du Général De Gaulle 61, 94010 Créteil, France;
- **Allgemeine Unfallversicherungsanstalt (AUVA)**, established in Vienna Twin Towers - Wienerbergstraße 11, 1100 Wien, Austria.

Data Controller

The Data Controller is the Politecnico di Milano, established in Milan, Piazza Leonardo Da Vinci, represented by the Director General delegated by the pro-tempore Rector – contact: dirgen@polimi.it.

ReBone Project contact person

The Project Contact person for the Politecnico di Milano is Professor Pasquale Vena – email: pasquale.vena@polimi.it

The data shall be processed by other persons authorised and instructed for this purpose in accordance with current legislation.

Data Protection Officer and contact details

E-mail: privacy@polimi.it

Purpose of the processing, legal basis, categories of data and retention period.

For the purposes of compliance with the relevant European Union, the GDPR, and national legislation, we hereby inform that your personal data will be used for the implementation of the ReBone Project, and specifically for the following activities:

Intended purpose of the personal data processing	Legal basis of the processing	Categories of personal data subject to processing	Data storage and retention period of personal data
Personal data will be collected to allow the accomplishment of the recruitment procedures in relation to the ReBone Doctoral Candidates open positions and then the signature of an employment contract between the selected DCs and the ReBone Host institution.	6.1 (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes.	Personal details, Contact details, Career details/CVs, copy of Identity card/passport	Applications to the ReBone project's open positions will be collected by means of "Google Forms"; therefore, during the recruitment data will be stored in the Google servers (Google Drive). The data are retained as long as it is necessary for the recruitment purposes. After the conclusion of the application process (e.g. by rejection from our side or withdrawal from your side), we will delete the data. Data of the recruited DCs will be deleted from the Google Storage and will be retained by the Data Controllers and Data processors for the time strictly necessary to the European Commission, the Research Executive Agency as well as the other bodies of the European Union (i.e. Court of Auditors, OLAF, European Prosecutor Office) to carry out their activities of audit and investigation.

Processing methods

The processing carried out for the purposes described above may be carried out on paper or on digital media, manually and/or using electronic or in any case automated tools, external databases (Google Forms, Next Cloud).

The data may also be stored in paper archives for the duration of the Project and after the end of Project for the time strictly necessary to the European Commission, the Research Executive Agency as well as the other bodies of the European Union (i.e. Court of Auditors, OLAF, European Prosecutor Office) to carry out their activities of audit and investigation.

In addition, the personal data will be stored for the time foreseen in order to comply with the national regulations in force and the internal rules regulation of the Data Controller.

The data acquired for the aforementioned purposes shall only be accessed by duly authorised personnel.

Categories of recipients

In relation to the purposes indicated above, the data may be disclosed to the following public and/or private entities:

- European Commission, the Research Executive Agency and the other bodies of the European Union (i.e. Court of Auditors, OLAF, European Prosecutor Office);
- National authorities for their activities as provided by the law;
- the Beneficiaries, as above mentioned, in order to carry out ReBone activities;
- potential service providers that might be involved if for the accomplishment of the Project. Such parties will be formally appointed as "External data processors" by the Politecnico di Milano. Furthermore, the collected data may also be disclosed to third party recipients, serving as sponsors of the initiative, for their own purposes within the context of the initiative or similar events.

Transfer to non-EU countries or international organizations

The Data Controller will process the personal data within the European Union in accordance with relevant law and regulations.

Should it become necessary to make use of parties located outside of the European Union for reasons of a technical and/or operational nature, or should it become necessary to transfer a part of the data collected to technical systems and services managed in the cloud and located outside of the European Union, the processing will be regulated in accordance with the provisions of Chapter V of the Regulation and authorised on the basis of specific decisions by the European Union.

All of the necessary precautions will be taken to guarantee the highest level of protection of the personal data. The transfer will be performed in compliance with Article 46 paragraphs 2 and 3 of the GDPR.

Rights of data subjects

According to Article 13 of the GDPR, as a data subject, you are entitled to request the Data Controller as follows:

- The access to your personal data and related information;
- The correction of inaccurate data or the completion of incomplete data;
- The cancellation of personal data concerning you, subject to conditions indicated in Article 17 GDPR , paragraphs 1 and 3;
- The restriction of the processing of your personal data, subject to conditions indicated in Article 18, paragraph 1 of GDPR applies;
- The portability of your personal data.

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

In addition, you have the right to lodge a complaint with a supervisory authority, i.e. the *Garante Italiano per la Protezione dei dati personali* (<https://www.garanteprivacy.it/>)