



ORDINE E FONDAZIONE DELL'ORDINE
DEGLI ARCHITETTI, PIANIFICATORI, PAESAGGISTI
E CONSERVATORI DELLA PROVINCIA DI MILANO

PERSONAL DATA PROCESSING POLICY

The policy of the Ordine degli Architetti, Pianificatori, Paesaggisti e Conservatori della Provincia di Milano ("Ordine") and of the Fondazione dell'Ordine degli Architetti, Pianificatori, Paesaggisti e Conservatori della Provincia di Milano ("Fondazione") regarding the processing of certain personal data is described herein. This policy applies to users of the website www.ordinearchitetti.mi.it and associated web services. The policy does not apply to other websites accessed via links.

Data Controller and Data Protection Officer

For the processing of certain data, the Data Controller is:

Ordine degli Architetti, Pianificatori, Paesaggisti e Conservatori della Provincia di Milano
Via Solferino 19 - 20121 Milano
email: segreteria@ordinearchitetti.mi.it; segreteria@oamilano.it (PEC).

For the processing of certain data, the Data Controller is:

Fondazione dell'Ordine degli Architetti, Pianificatori, Paesaggisti e Conservatori della Provincia di Milano
Via Solferino 19 - 20121 Milano
email: fondazione@architettura.mi.it; fondazione@oamilano.it (PEC).

The Ordine has also appointed a Data Protection Officer who may be contacted via the Ordine's main office or via email at privacy@ordinearchitetti.mi.it.

Purposes, Duration, and Legal Basis for Personal Data Processing

Processing of navigation data (Data Controller: Ordine)

Processed data include IP addresses or domain names of the computer(s) used by users who connect to the website, the time of request, and other parameters relating to user operating system and computing environment.

Visitor navigation behaviour is also analysed, e.g., pages visited before and after a given page. The data are collected via cookies and thus on the legal basis of the consent of the Data Subject expressed via the banner or specific page of our website (consent must be renewed after 13 months). Processing is conducted on aggregate data. The data are stored for a maximum of three years.

These data are processed per the following legal basis:

- legitimate interest of the Data Controller, to obtain anonymous statistical information on the use of the website, and to monitor the proper functioning of the website;
- consent of Data Subject via the digital form that is presented when accessing the website; the purpose is to obtain additional statistical information, not based on anonymous data, on services offered by the Ordine and by the Fondazione.

Additional details are provided in the Cookie Policy.

Access to private area – login form (Data Controller: Ordine)

The website allows you to register to access the private area [*area riservata*] in order to use certain services. Ordine members must provide an email address and member number to register, others need only provide an email address. The legal basis for processing these personal data is the provision of a service requested by the Data Subject.

The website tracks those who access the private area. The legal basis for the processing of associated data is the legitimate interest of the website administrator because the tracking of certain actions by users may be useful in the event of security issues.

Personal data used for said access will be stored until the Data Subject requests their deletion. Tracking data will be stored for a maximum of three years.

Newsletter Subscription (Data Controller: Ordine)

The processed data are the user email address and other contact data provided directly by the Data Subject on our website or via other means.

The legal basis for personal data processing is Data Subject consent, requested during the registration process for those who use our website and when confirming the registration / subscription. The Data Subject may revoke consent at any time following the procedure indicated in every email received.

The personal data will be stored until the Data Subject explicitly requests their deletion.

For the purpose of obtaining statistical data regarding our newsletters, we collect personal data regarding certain actions: opening the newsletter, use of proposed links, pages visited of the website. The analysis is performed on aggregated data. The data are stored for a maximum of three years.

The newsletter service is administrated by the Fondazione.

Information Services (Data Controller: Ordine)

The personal data are processed by the professionals (e.g., lawyer, tax consultant) providing consulting services via info points to members by member request.

The personal data are used exclusively in reserving an appointment. All other personal data provided during the information/consulting services are not collected or stored.

These personal data are used per the legal basis of executing contract conditions accepted per request of the Data Subject.

The personal data are stored only until the end of the meeting with the professional.

Handling of CVs (Data Controller: CV recipient, Ordine, Fondazione)

The submission of a CV via email or via contact forms to the addresses provided on this website entails the acquisition of the sender's address in order to be able to respond to the requests, as well as any other personal data provided by the user.

These personal data are used per the legal basis of executing pre-contractual measures accepted per request of the Data Subject.

The personal data are stored for three years from the date of receipt of the CV in order to allow further selection or contact actions. The storage of the personal data may be extended to a total of five years since they are memorized on backup media.

Management of Requests on the DIMMI Platform (Data Controller: Ordine)

Personal data submitted via the DIMMI platform (ordinearchitetti.mi.it/it/professione/dimmi) entails the acquisition of the sender's address, which is necessary to respond to user requests. These data are used per the legal basis of executing pre-contractual measures accepted per request of the Data Subject.

DIMMI platform users may agree to receive evaluation questionnaires regarding the service. The legal basis for the processing of associated personal data is Data Subject consent.

The personal data recorded by the DIMMI service are processed on the HubSpot platform (see below).

The personal data are stored for three years following the provision of the service for quality control purposes; the storage of the personal data may be extended to a total of five years since they are memorized on backup media.

Classified and Employment Ad Platform (Data Controller: Ordine)

The Ordine and the Fondazione provide an employment ad platform on <https://cerco-offro.ordinearchitetti.mi.it>.

Those offering employment do not necessarily have to provide personal data but must register on the website (email, and member number if a member of the Ordine); the refusal to provide requested data (personal or non-personal) will make it impossible to post a job offering. The personal data are published for 30 days unless otherwise requested by the Data Subject and are deleted from our archives after an additional five months.

The personal data uploaded to the platform are published and thus accessible to all.

The personal data are processed per the legal basis of provision of a service requested by the Data Subject.

The personal data will also be transferred to the HubSpot platform and used on an aggregate basis for statistical purposes, for example, for the types of qualifications sought and areas of specialization offered. This processing is performed on the legal basis of the legitimate interest of the Data Controller to improve its services.

The email provided may be used to send questionnaires to evaluate the service. This processing takes place per consent of the Data Subject.

The personal data are stored until the expiry date or until a request is made by the Data Subject for their deletion. The storage of the personal data may be extended since they are memorized on backup media.

Provision of training courses, events, and itineraries (Data Controllers: Ordine, Fondazione, others)

The personal data subject to processing and the purposes of said processing are listed below:

- for participants in training courses (including webinars), events, and itineraries, the contact information provided by the user will be used to record attendance, deliver organizational notifications regarding the event, requests for information regarding satisfaction with the event, and to propose similar events.
- for instructors and professionals, the contact data and CVs, necessary to organize activities and perform quality assurance, will be processed.

For participant registration, dispatch of organizational notifications, request for information on satisfaction with event, and the proposal of similar events, the Data Controller is the Fondazione. Registration takes place via the Fondazione website.

The courses, events, and itineraries are administrated by the Fondazione. Registration data may be shared with sponsors for the purposes of providing additional information (e.g., newsletter) only by Data Subject consent or if said sponsors provide web platforms necessary for participating in the course, event, or itinerary.

The Fondazione and the Ordine process personal data for the following purposes:

- Fondazione, as Data Controller, to record the activity, dispatch organizational notifications, request information on satisfaction, propose similar events, and, if applicable, to assess quality;
- Ordine, for Ordine members, as Joint Data Controller with CNA [Italian Council of Architects], records the activities of members and assesses the quality of the training.

The legal basis for the processing of personal data is to fulfil contract terms of which the Data Subject is party, compliance with legislation in force regarding accounting, and the legitimate interests of the Data Controllers (regarding quality control, request for information on satisfaction, and the proposal of similar events, pursuant to Italian Legislative Decree no. 196 of 30 June 2003 [D.Lgs. 196/2003], Article 130, Paragraph 4).

The personal data will be stored for ten years following the conclusion of the course, event, or itinerary (in the event of payments, these data are also stored in compliance with accounting law); the storage of the personal data may be extended for an additional year since they are memorized on backup media.

The Fondazione may use the email addresses of participants in courses, events, or itineraries to promote similar initiatives. In this case, the personal data will be stored until the Data Subject requests their deletion (see below). The Data Subject reserves the right to refuse said notifications.

Representatives of Partners, Partnering Organizations, and other Organizations (Data Controllers: Ordine and Fondazione)

The Ordine and the Fondazione gain knowledge of contact information of the physical persons who represent the organizations with which the Ordine and the Fondazione have relations. The purpose here is to facilitate said relations.

The personal data will be processed on the legal basis of legitimate interest.

The personal data may be stored for ten years following termination of said relations because they are combined with data to be stored according to legislation in force.

Collection of Data from Social Networks (Data Controllers: Ordine and Fondazione)

The Ordine and the Fondazione (each one Data Controller of personal data processed on its social media channels) as Joint Data Controller together with the social network administrator (which provides its own independent personal data processing policy) process personal data of visitors to their social network pages (Facebook, Twitter, Instagram, LinkedIn, and YouTube) using tools provided by the social network administrator (which uses cookies and other tracking tools) for the following purposes: analysis of visits, interaction with users, sending of non-private messages, and other activities provided by the channel. The personal data is processed on the legal basis of the consent of the Data Subject provided when registering on the social network to respond to the Data Subject's requests, and by legitimate interest of the Data Controller (tracking of its interactions with users, assessment of company image, marketing). The personal data are stored by the social network channels according to rules established by said channels.

The personal data will be deleted or the processing thereof interrupted (or restricted) by explicit request of Data Subject who uses the functions provided by each social media channel.

Participation in Prize Contests (Data Controller: Fondazione)

You must provide your personal data (e.g., identification and contact information) to the Fondazione to participate in prize contests. The Fondazione will process these data for the following purposes:

1. management of communication with contestants;
2. association of contest materials with contestants;
3. evaluation of the contest materials, establishment of rankings, and awarding of prizes;
4. exhibition of contest materials identifying the author;
5. conservation in the historical archives;
6. promotion of the prize contest by presenting contestants and winners;
7. sharing of contacts with prospective employers, only with Data Subject consent.

Images of contestants may be captured during events or awards ceremonies by videographers or photographers. The videos and photos may be used by the Fondazione for the sole purposes of promoting and publicizing the prizes and the winners.

The personal data are processed on the following legal bases:

- provision of a service (participation in the contest) requested by the contestant;
- legitimate interest of the Data Controller (quality control, exhibits of materials, promotion of the prize);
- consent (sharing for employment purposes).

Some personal data (e.g., name) of contest participants will be made public and stored for an indefinite period with the purpose of publicizing and promoting the prize.

Contact data will be kept together with the submitted material so that the author can be contacted in the case of need.

The personal data may be communicated to sponsors or trade magazines, which will act as independent Data Controllers and provide their own personal data processing policy and, where applicable, request Data Subject consent for further personal data processing.

Please note:

- the submitted material may have been published thus making it impossible to meet all the requests made by the Data Subject;
- once the prize has been awarded, the modification or anonymization of the material may require a great deal of work and thus the requests of the Data Subject may be considered "excessive", entitling the Fondazione to request a reasonable payment or refuse to meet the request.

Library (Data Controller: Fondazione)

Users must provide personal data to consult or borrow books from the Fondazione library. The Fondazione will process these data for the following purposes:

- record online reservations;
- verify right to borrow books (as member of the Ordine or Friend of the Fondazione);
- verify the return of borrowed materials, solicit the return of overdue materials, and impose any fines as provided by library rules;
- allow use of the networked workstation and impose any fines as provided by library rules.

The personal data are processed on the legal basis of providing a service requested by the Data Subject.

The personal data will be stored for the time necessary to complete the loan.

Submission of Petitions to the Disciplinary Committee (Data Controller: Ordine)

For members of the Ordine, the personal data policy is that provided to members of the Ordine.

Regarding the petitioner, the personal data processed are contact information and those contained in the petition.

The legal basis for personal data processing is the consent expressed by the petitioner (Data Subject) when submitting the petition. Further processing rests on the legal basis of complying with law (Regio Decreto 2537 of 1925 as currently amended) and with the "Regolamento di Funzionamento del Consiglio di Disciplina" [Functional Regulations of the Disciplinary Committee], which are available on the website of the Ordine.

Once the petition has been submitted, the petitioner can no longer request interruption, restriction, or blocking of the processing.

The failure to provide consent for personal data processing will make it impossible for the Ordine or the Disciplinary Committee to take any action regarding the petition, which will nevertheless be archived in the document register.

When submitting the petition, the petitioner undertakes to handle personal data in such a way as to ensure their protection.

The personal data will be stored for no longer than ten years after the conclusion of the procedure.

Analysis of Services (Data Controller: Ordine)

Via the HubSpot service, personal data collected regarding navigation on the website, registration with the Ordine, and participation in events are processed so as to obtain statistics on services offered by the Ordine and the Fondazione in order to improve said services.

The personal data are not anonymous (IP address, user name and residence) but are not used for profiling, segmenting, or behavioural analysis; they are used to obtain more precise data on services offered (e.g., types of participants in given events).

These personal data are used per the legal basis of the legitimate interest of the Data Controller and to obtain anonymous statistical information on the use of offered services.

Communication with third parties and transfer of personal data to third-party countries

For some of the activities in our processing of personal data, the Ordine may communicate a portion of personal data to external companies and specifically providers of IT services.

Said companies have agreed, in a formal contract, to process personal data only for the necessary purposes.

For statistical analysis, we use the HubSpot platform, with registered offices in the United States.

Further transfers of personal data outside of Italy are detailed above by individual purpose.

Data Subject Rights

You have certain rights per Personal Data legislation. Specifically, you have the right to:

- obtain, if not prohibited by laws or regulations, access to your personal data, the rectification of inaccurate personal data, the erasure of personal data, to restrict or block processing of personal data; you may also request data portability (receive personal data concerning you in a structured, commonly used, machine-readable format);
- withdraw consent for processing, if not prohibited by laws or regulations;
- submit an objection to the Data Controller, to the Data Protection Officer (in the case of the Ordine) or to the National Data Protection Authority (in Italy this is the Italian Data Protection Authority [*Garante per la protezione dei dati personali*]) following the instructions on the relevant website.

You may only exercise the above rights through the above-mentioned channels.

Version of 19 October 2022