POLITECNICO
MILANO 1863

PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA
PURSUANT TO ARTICLE 13 OF EU REGULATION NO. 679 OF 27 APRIL 2016

This information 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.

In particular, this Policy refers to the processing of personal data carried out by Politecnico di Milano as part of the **assistance, support and help desk services** made available through institutional portals and applications, ticketing systems, online forms and other assistance channels of the University, regardless of the area to which the request refers.

Data Controller

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

Data Protection Officer and Contact Points

Mail: privacy@polimi.it - Tel. 02 23999378.

Purpose of processing, legal basis, categories of data and storage period

For the purposes of applying European and national legislation on the subject (EU Regulation no. 679/2016, hereinafter EU Regulation), we inform you that personal data will be used for the following purposes:

Purpose of the processing	**Legal basis of the processing**	**Categories of personal data subject to processing**	**Retention period**
Purpose 1 Management of requests for information, assistance and support and in particular: identification, where necessary, of the applicant; taking charge, classification and addressing of the request to the competent structure; provision of feedback; performance of the technical, administrative and organizational activities necessary to resolve the request; security and proper functioning of services; documentation and monitoring of assistance activities and improvement of the organization and quality of the related services.	Public interest (Art. 6, par. 1, letter e), of the EU Regulation).	• Identification and personal data; • contact details; • data relating to the data subject's relationship with the Politecnico di Milano and his/her profile or role; data relating to the university career or employment relationship, where necessary; • technical and system usage data, including user identifiers, login data, and logs; • content of the request, communications made and any documents or attachments transmitted; • additional personal data provided by the data subject and necessary for the management of the request. In relation to the content of the request, data belonging to special categories pursuant to art. 9 of the EU Regulation or data referred to in art. 10 of the same Regulation may also be processed, where necessary and in the presence of the relevant regulatory requirements.	Personal data and documentation relating to requests for assistance are stored for the time necessary to manage and conclude the request and, subsequently, for the period provided for by the document retention rules applicable to Politecnico di Milano and in any case not beyond what is necessary with respect to the purposes for which they were collected, without prejudice to any legal obligations or needs to protect the rights of the Data Controller.

Nature of the data

The provision of the data necessary to manage the request is necessary to allow Politecnico di Milano to take charge of and provide feedback to the request for assistance. Failure to provide the necessary information may make it impossible to manage or complete the request.

The data subject is invited not to enter personal data that is not necessary with respect to the subject of the request, in particular data referring to third parties or information belonging to special categories, unless they are indispensable to obtain the requested assistance.

Processing methods

The processing is carried out mainly with IT and telematic tools and, where necessary, through other tools used by the competent structures. Requests can be recorded in the assistance and ticketing systems used by the Politecnico and made accessible only to authorized personnel and to subjects who need to know the content for the management and resolution of the request.
Appropriate technical and organisational measures are taken to ensure the security, confidentiality, integrity and availability of personal data.

Categories of recipients

In relation to the purposes indicated, the data are processed by the staff of the Politecnico di Milano authorised and instructed in relation to their respective functions. When necessary for the management of the request, the data may be communicated to the Politecnico structures responsible for the subject.
The data may also be processed by suppliers of technological services, maintenance, assistance or management of the platforms used by the Politecnico, duly designated, where the conditions are met, as Data Processors pursuant to art. 28 GDPR. The data may be communicated to other public or private entities only when such communication is required by law or is necessary for the fulfilment of regulatory obligations or for the performance of the institutional functions of the Politecnico.

Transfer to a non-EU country or international organizations

Personal data will be processed by the Data Controller 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 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 area, 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 total 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 third party recipient pursuant to art. 46 of the EU Regulation;
c) on the adoption of binding corporate rules, so-called. *Corporate binding rules*.

Rights of the data subjects

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

1. confirmation of the existence or otherwise of personal data concerning you and access to your personal data and information relating to them (art. 15 of the GDPR);
2. the correction of inaccurate data and the integration of incomplete data (art. 16); requests referring to minutes and official acts are handled in compliance with the rules on their formation and documentary integrity;
3. the deletion of personal data concerning you, upon the occurrence of one of the conditions of art. 17, par. 1, and in compliance with the exceptions of par. 3 (in particular legal obligations, tasks of public interest and archival preservation needs);
4. the limitation of processing, in the event of one of the hypotheses of art. 18, par. 1.

As a data subject, you also have the right to object, for reasons related to your particular situation, to processing based on art. 6, par. 1, letter e), of the GDPR (art. 21): the Data Controller shall refrain from processing, unless it demonstrates compelling legitimate reasons prevailing or the need to ascertain, exercise or defend a right in court. The right to portability (art. 20) does not apply to the processing described herein, based on tasks of public interest and legal obligations.

These rights can be exercised by contacting privacy@polimi.it or the Data Controller (dirgen@polimi.it). The feedback is provided in the terms of art. 12 of the GDPR, usually within one month of receipt of the request, without prejudice to the justified extension provided for by the law.

If you believe that your rights have been violated by the Data Controller and/or a third party, you have the right to lodge a complaint with the Data Protection Authority (www.garanteprivacy.it) and/or other competent supervisory authority pursuant to the GDPR, and to appeal to the judicial authority.

Milan, October 2026.

This privacy notice has been translated into english with the support of AI tools. The official and legally binding version is the italian text. In case of discrepancies, the italian version shall prevail.