

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

This information notice is provided pursuant to Article 13 of Regulation (EU) 2016/679 of 27 April 2016 (hereinafter the “EU Regulation”), concerning the protection of natural persons with regard to the processing of personal data and in compliance with the applicable legislation on personal data processing, as well as on the free movement of such data.

In particular, this Information Notice refers to the processing of personal data carried out in the context of participation in outgoing international mobility programmes promoted by Politecnico di Milano.

Data Controller

Politecnico di Milano, represented by the Director General under delegation of the Acting Rector, contact: dirgen@polimi.it.

Internal Data Processor

Dr Assunta Marrese, Head of the Academic Affairs Area, contact: assunta.marrese@polimi.it.

The data may also be processed by additional authorised subjects, duly instructed in compliance with the applicable legislation.

Data Protection Officer and Contact Details

Email: privacy@polimi.it.

Purposes of the Processing, Categories of Data, Legal Basis and Retention Period

For the purposes of applying European and national legislation, personal data will be processed for the following purposes:

1. Management of administrative and academic procedures related to outgoing international mobility (application, selection, ranking lists, agreements, Learning Agreement, recognition of activities upon return);
2. Fulfilment of reporting and control obligations required by mobility programmes;
3. Management of financial contributions and support measures (including those related to “fewer opportunities” conditions);
4. Management of operational communications with partner universities/institutions;
5. Initiatives to support students participating in international mobility programmes;
6. Surveys and statistics for the assessment of administrative and academic aspects related to international mobility programmes;
7. Management of the educational offer – internationalisation of education;
8. Orientation and tutoring activities for international mobility;
9. Initiatives for sharing experiences and/or issues related to international mobility projects;
10. Statistical analysis and research on aggregated or anonymised data.

For the above purposes, the categories of personal data processed are as follows:

- **Common data:** personal, identification and contact data (name, surname, date and place of birth, tax code, residence, citizenship, personal code, student ID number), identity document, email address, educational qualification obtained, curriculum vitae, bank account details; data relating to

previous academic careers; data relating to selection procedures (e.g. results of selection procedures); images and audio/video recordings.

- **Special categories of data (Article 9 of the EU Regulation):** racial and ethnic origin (for non-EU citizens and for refugee status), health status (for students with disabilities).

The legal bases that render the processing of the aforementioned personal data lawful are:

- ✓ Article 6(1)(e) of the EU Regulation, “task carried out in the public interest”;
- ✓ Article 6(1)(c) of the EU Regulation, “compliance with a legal obligation”;
- ✓ Article 6(1)(b) of the EU Regulation, “performance of a contract”.

Nature of the Data

The provision of data required for the stated purposes is free and optional.

However, failure to provide such data will make it impossible to guarantee the services or to achieve the intended purposes.

Methods of Processing

Processing operations carried out for the purposes indicated may be performed both on paper and digital media, manually and/or by means of electronic or automated tools.

Data are also stored in paper archives for the duration of the processing and in digital format for an indefinite period due to transparency obligations and the proper functioning of public administration.

Access to data collected for the stated purposes is granted only to duly authorised staff.

Categories of Recipients

In relation to the purposes indicated above, in addition to the University’s employees and collaborators acting on the basis of specific instructions, personal data may also be communicated to other public administrations, including in anonymised form where they are required to process such data for institutional procedures under their competence, as well as to all public entities to which communication is mandatory pursuant to European legislation, laws or regulations, and to insurance bodies for any accident-related procedures.

In particular, Politecnico di Milano may communicate personal data to:

- Erasmus+ National Agency Italy;
- European Commission;
- Ministry of Universities and Research (MUR);
- Universities and research institutions located in EU Member States and/or in countries participating in the Erasmus+ Programme (European Economic Area);
- Universities and research institutions located in non-EU countries;
- Local authorities, Ministry of Foreign Affairs, Police Headquarters, Italian representations abroad, foreign representations in Italy;
- Judicial authorities;
- Public or private entities qualifying as “enterprises” as defined in Decision No. 170/2006/EC establishing the Lifelong Learning Programme (LLP), located in EU Member States and/or in countries participating in the Erasmus+ Programme (European Economic Area);
- Service providers required for technical and administrative management who, solely for the purposes of the requested service, may become aware of the personal data of data subjects and who

are expressly appointed as Data Processors pursuant to Article 28 of the EU Regulation by Politecnico di Milano.

Transfer to Non-EU Countries or International Organisations

Personal data may be transferred to non-EU countries in accordance with the principles set out in the EU Regulation.

In particular, where it is necessary to transfer data to non-European countries, the safeguards provided for in Chapter V of the EU Regulation shall be adopted, namely:

- verification, pursuant to Article 45(3), of the existence of adequacy decisions for the country in which the recipient institution or organisation is located;
- in the absence of an adequacy decision by the European Commission for a given country, Politecnico di Milano shall, pursuant to Article 46 of the GDPR, adopt specific contractual safeguards with the recipient institution or organisation;
- appropriate safeguards provided by the third-party recipient pursuant to Article 46 of the EU Regulation;
- adoption of binding corporate rules (“Corporate Binding Rules”);
- where none of the above measures can be implemented, Politecnico di Milano shall request the explicit consent of the data subject to the proposed transfer, after having duly informed them of the potential risks associated with such transfers.

Rights of Data Subjects

Data subjects may at any time exercise the following rights vis-à-vis the Data Controller, pursuant to Articles 15 to 22 of the EU Regulation:

- to obtain confirmation as to whether or not personal data concerning them are being processed and, where that is the case, to obtain access to such data and, where the data have not been collected from the data subject, all available information on their source;
- to request rectification, erasure of data or restriction of processing;
- to object to the processing of their data, without prejudice to the right of the Data Controller to assess such request;
- to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- to obtain data portability, in the cases provided for by law.

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

Where the data subject believes that their rights have been infringed by the Data Controller and/or a third party, they have the right to lodge a complaint with the Data Protection Authority and/or with another competent supervisory authority under the EU Regulation.

Milan, April 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.