



POLITECNICO  
MILANO 1863

## **PERSONAL DATA PROCESSING INFORMATION PURSUANT TO ARTICLE 13 OF THE EU REGULATION N. 679/2016 OF 27 APRIL 2016**

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

This information document is also addressed to all those that, for any reason, work with and/or provide professional services to Politecnico di Milano.

### **Data Controller**

Politecnico di Milano - General Manager upon authorization of the pro-tempore Rector - contact: [dirgen@polimi.it](mailto:dirgen@polimi.it).

### **Internal data processor**

Dr.ssa Alessandra Moroni - Piazza Leonardo da Vinci 32, Milano (MI) - phone +390223992153, e- mail [alessandra.moroni@polimi.it](mailto:alessandra.moroni@polimi.it).

Data will be processed by other authorized parties and, for this purpose, in compliance with current legislation.

### **Responsible for data protection and contact points**

E - mail: [privacy@polimi.it](mailto:privacy@polimi.it).

### **Purposes of data processing, legal basis, data categories and storage period**

Politecnico di Milano, as data controller, will process the personal data provided by the interested party exclusively in the context of the employment relationships established with the University, in order to comply with the provisions of the current legislation concerning the management of employment relationship in Public Administrations and collective and supplementary company- level agreements, where applicable, as well as the management of tax and social security charges.

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



Purposes of the processing for which personal data are intended	Legal basis of data processing	Categories of personal data to be processed	Storage period of personal data
<p><b>Purpose 1:</b> recruitment, carrying out of selection and competition procedures.</p>	<p>Pre-contractual obligations (Legislative Decree 165/2001, Chapter III, Article 30 and following articles, Article 6, paragraph 1, letter c of the Regulation).</p>		<p>For the duration and after the contractual relationship, for the time in which Politecnico di Milano is compulsorily required to store these data for tax or social security purposes or for other purposes, provided by law or Regulation.</p>
<p><b>Purpose 2:</b> obligations related to the management of the employment contract, including:</p> <ul style="list-style-type: none"> <li>- stipulation of the employment contract;</li> <li>- management of the work relationship;</li> <li>- management of personal data;</li> <li>- assignment and management of tasks;</li> <li>- working time management;</li> <li>- payment and remuneration management;</li> <li>- management of training and professional development.</li> </ul>	<p>Contract (Legislative Decree 165/2001 “General rules on the structure of employment in public administrations”, National Collective Agreement (CCNL) in force, at that time, concerning University, Education and Research, Article 6, paragraph 1, letter b) of the Regulation).</p>	<ul style="list-style-type: none"> <li>• Identification data</li> <li>• Personal data</li> <li>• Tax data</li> <li>• Banking data</li> <li>• Career data</li> <li>• Disciplinary data</li> <li>• Judicial data</li> <li>• Health data.</li> </ul>	<p>For the duration and after the contractual relationship, for the time in which Politecnico di Milano is compulsorily required to store these data for tax or social security purposes or for other purposes, provided by law or Regulation.</p>



<b>Purpose 3:</b> welfare system management.	To fulfil a legal obligation (Article 6, paragraph 1, letter c) of the Regulations. Ex.: CCNL in force, trade union agreements.	<ul style="list-style-type: none"><li>• Identification data</li><li>• Personal data</li><li>• Legal data</li><li>• Wage data</li><li>• Tax data</li></ul>	For the duration and after the contractual relationship, for the time in which Politecnico di Milano is compulsorily required to store these data for tax or for other purposes, provided by law or Regulation.
<b>Purpose 4:</b> management of the professional Model and the Job Evaluation system.	To fulfil a legal obligation (Article 6, paragraph 1, letter c) of the Regulations. Ex.: CCNL in force, CCIL in force.	<ul style="list-style-type: none"><li>• Identification data</li><li>• Data concerning the activities carried out</li></ul>	For the duration and after the contractual relationship, for the time in which Politecnico di Milano is compulsorily required to store these data for tax or for other purposes, provided by law or Regulation.
<b>Purpose 5:</b> training management and staff development processes.	To fulfil a legal obligation (Article 6, paragraph 1, letter c) of the Regulations. Ex.: CCNL in force, CCIL in force.	<ul style="list-style-type: none"><li>• Identification data</li><li>• Data concerning the activities carried out</li></ul>	For the duration and after the contractual relationship, for the time in which Politecnico di Milano is compulsorily required to store these data for tax or for other purposes, provided by law or Regulation.



<b>Purpose 6:</b> management of trade union relations	To fulfil a legal obligation (Article 6, paragraph 1, letter c) of the Regulations. Ex.: CCNQ related to CCNL in force.	<ul style="list-style-type: none"><li>• Identification data</li><li>• Personal data</li><li>• Legal data</li><li>• Wage data</li><li>• Data related to individual assessment</li></ul>	For the duration and after the contractual relationship, for the time in which Politecnico di Milano is compulsorily required to store these data for tax or for other purposes, provided by law or Regulation.
<b>Purpose 7:</b> management of University remuneration policies.	To fulfil a legal obligation (Legislative Decree 150/2009 related to productivity optimization of public work and efficiency and transparency of public administrations; Article 6, paragraph 1, letter c) of the Regulation.	<ul style="list-style-type: none"><li>• Identification data</li><li>• Personal data</li><li>• Legal data</li><li>• Wage data</li></ul>	For the duration and after the contractual relationship, for the time in which Politecnico di Milano is compulsorily required to store these data for tax or for other purposes, provided by law or Regulation.
<b>Purpose 8:</b> management of the performance management system.	To fulfil a legal obligation Article 6, paragraph 1, letter c) of the Regulation. Ex.: Legislative Decree 150/2010.	<ul style="list-style-type: none"><li>• Identification data</li><li>• Personal data</li><li>• Legal data</li><li>• Data related to individual assessment</li></ul>	For the duration and after the contractual relationship, for the time in which Politecnico di Milano is compulsorily required to store these data for tax or for other purposes, provided by law or Regulation.



<p><b>Purpose 9:</b> any institutional communications, in order to pursue the purposes specified in the Statute, made through text/photo/audio/video material on electronic communication (e.g.: via internet) or traditional (press, news, brochures, etc.) media concerning the activities/initiatives managed by the organization that can contain data and images/videos/audios clearly showing the interested party, collected, for example, also through interviews, narration of case studies, events, etc.</p>	<p>Consent - Article 6, paragraph 1, letter a) of the Regulation.</p>	<ul style="list-style-type: none"><li>• Identification data</li><li>• Personal data</li><li>• Images and audio/video footage.</li></ul>	<p>For the duration and after the contractual relationship, for the time in which Politecnico di Milano is compulsorily required to store these data for tax or for other purposes, provided by law or Regulation.</p>
<p><b>Purpose 10:</b> disciplinary procedures related to staff.</p>	<p>Public interest - Article 6, paragraph 1, letter e) of the Regulation.</p>	<ul style="list-style-type: none"><li>• Identification and personal data;</li><li>• Data related to the service of employee;</li><li>• Disciplinary measure.</li></ul>	<p>Data related to any disciplinary proceedings will be kept for an unlimited period of time with respect to the final provision and for 5 years in the event of lifting or cancellation of the final provision.</p>



<p><b>Purpose 11:</b> management of judicial and extrajudicial disputes for the application of the rules on administrative penalties and complaints; to enforce the right of defence in administrative or judicial proceedings, debt collection, transaction proposals, arbitrations.</p>	<p>Public interest or legal obligation - respectively Article 6, paragraph 1, letter e) and letter c) of the Regulation.</p>	<ul style="list-style-type: none"><li>• Identification data:</li><li>• Service data</li><li>• Particular data (health)</li><li>• Judicial data.</li></ul>	<p>The data collected for this treatment will be kept for the time strictly necessary to achieve the purpose.</p>
<p><b>Purpose 12:</b> employer branding activities and staff engagement policies.</p>	<p>Consent - Article 6, paragraph 1, letter a) of the Regulation.</p>	<ul style="list-style-type: none"><li>• Identification data</li><li>• Personal data</li><li>• Contact data</li><li>• Images and audio/video footage.</li></ul>	<p>The data collected for this treatment will be kept for the time strictly necessary to achieve the purpose.</p>
<p><b>Purpose 13:</b> historical research, statistics, storage of archival material.</p>	<p>Public interest - Article 6, paragraph 1, letter e) of the Regulation.</p>	<ul style="list-style-type: none"><li>• Personal data acquired during selections, concerning rankings or minutes;</li><li>• Data related to personal details and management of legal and work career;</li><li>• Personal data collected for possible disciplinary proceedings against the employee.</li></ul>	<p>Storage over an unlimited period of time, in accordance with the storage obligations provided by current legislation.</p>

Politecnico di Milano may also use and collect, through photographic services, video images ("Images") of the data subject which also constitute personal data pursuant to the Regulation.

For the collection and processing of the data referred to in Purposes 9 and 12, it is necessary to collect the consent of the data subject, as the legal basis for the processing of the EU Regulation. In the event of any withdrawal of consent, Politecnico di Milano will remove the Images from its website or from its public social network pages, within fifteen working days of receipt of the request. If the Images have been



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published in paper or multimedia format, in the event of the interested party's opposition to further dissemination, the latter will no longer be included in the subsequent reprint.

### **Nature of data**

The provision of data is compulsory. Any refusal to provide them could lead to failure to establish an employment relationship, to withdraw an existing relationship, or inability to provide the services requested/due.

The personal data collection is limited to the minimum necessary for each specific purpose of the processing.

### **Special categories of data**

Personal data of particular categories pursuant to *former* Article 9 of the Regulations can be processed, such as:

- data related to health status;
- personal data related to criminal records and crimes (Article 10);
- data related to trade-union membership.

The aforementioned personal data are processed for the purposes shown in TABLE 1, in particular for:

- Establishment and management of the work relationship.
- Working time management.
- Management of University remuneration policies.
- Welfare system management.

In addition, data collected may include judicial data, understood as data relating to criminal convictions, offences or related security measures, data contained in the self-certifications sent to Politecnico di Milano, in the certificates requested ex officio from the public administrations that ordinarily hold them.

### **Processing methods**

The data processing for the above mentioned purposes can be performed both through paper and digital means, manually and/or with electronic tools or, in any case, through automated tools. They are also stored in paper archives for the duration of the processing and in digital format for an indefinite period of time due to the transparency and good operation of the public administration.

Personal data of the data subject may also be disseminated on the University websites for the fulfilment of the transparency obligations referred to in Legislative Decree no. 33 of 2013, or where this is necessary to execute obligations arising from the employment contract.

In addition, the identification and contact data (company telephone number and email address) are published on the institutional website of Politecnico di Milano and may be communicated to customers, suppliers, external professionals or other third parties with whom the University collaborates in various capacities.

The above-mentioned subjects will process personal data as Data Processors or independent Data Controllers. In order to respond to any requests from the postal police and/or the judicial authorities or at the request of the Management of Politecnico di Milano, when a harmful event or a dangerous situation occurs that requires immediate intervention, the University may process the personal data contained in the logs. In this regard, for further information you can consult the following web page: [Non-primary personal information - polimi](#) .

The use of the badge in the context of the University's attendance and access control systems involves the



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collection by the University of the following personal data: numerical identifier of the badge, date/time of passage, identification of the gate/stamper, towards entry/exit (only for attendance detection).

Access to data acquired for the purposes mentioned above is allowed to duly authorized staff.

### **Recipient categories**

In relation to the mentioned purposes, data may be disclosed to the following public and/or private subjects (and/or subject categories indicated below), as to say to companies and/or persons, in Italy and abroad, that provide services, including external ones, on behalf of the Data Controller. In particular, personal data may be communicated also to other public administrations, if these last ones, also as anonymised or aggregated entities, if these institutions must process them for procedures related to their institutional work, as well as to all those public entities to whom, with the same prerequisites, the communication is compulsorily provided in accordance to EU provisions, laws or regulations, as well as insurance companies for possible procedures.

Furthermore, Politecnico di Milano may disclose personal data to the following subjects for carrying out its institutional activities or to fulfil specific legal obligations:

- INPS - GDP (for provision and payment of pension, according to the provisions of Law 335/1995 and Law 152/1968).
- INAIL.
- Police Authority.
- Single Desk for Immigration, as required by the Presidential Decree n. 334/2004.
- Competent healthcare facilities for tax audit.
- Public and private subjects entrusted with in-house training activities of the University's PTA.
- Public and private entities providing career and attendance management systems of PTA.
- Public and private entities providing services to the PTA:
  - ✓ Subjects providing training activities;
  - ✓ Providers of welfare services (Edenred, Trenord, ATM) and health policy of the University PTA (Insieme Salute SMS - Supplementary Health Insurance);
  - ✓ Subjects that offer services to employees for nursery school or summer centre activities.
- Territorial Labour Office.
- Employment centres or competent bodies at the local level for hiring, terminations and changes to the employment relationship.
- Judicial authority.
- Other Public Administrations.
- Presidency of the Council of Ministers - Department of Public Administration.
- MIUR (Ministry of Education, University and Research).
- MEF (Ministry of Economy and Finance).
- Trade Unions.
- Other Universities or International Organizations.
- Research Institutions.
- European Union Bodies;
- Insurance companies in the event of accidents or other insurance obligations

### **Transfer to non-EU countries or international organisations**

Personal data shall be processed by the Data Controller within the European Union. Should it become necessary for technical and/or operational reasons to use entities located outside the European Union, or





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should it become necessary to transfer some of the collected data to technical systems and services managed in the Cloud and located outside the European Union, data processing shall be regulated in accordance with Chapter 5 of the Regulation and authorised on the basis of specific decisions by the European Union. All of the necessary precautions shall therefore be taken to ensure the maximum protection of personal data, basing the transfer on: a) adequacy decisions on recipient third countries made by the European Commission; b) appropriate guarantees provided by the recipient third party under Art. 46 of the EU Regulation; c) the adoption of Binding Corporate Rules

### **Rights of the interested parties**

The interested party has the right to request the Politecnico di Milano, as Data Controller, pursuant to Articles 15, 16, 17, 18, 19 and 21 of the GDPR:

- access to personal data and to all information pursuant to Article 15 of the GDPR;
- to correct personal data and the addition of incomplete data;
- to cancel the data, except for those already included in documents that must be kept by Politecnico di Milano and unless there is a legitimate reason of interest to proceed with data processing.
  - the limitation of data processing, for what mentioned in Article 18 of the GDPR.

The interested party also has the right:

- to object to personal data processing, without prejudice to the provisions regarding the necessity and compulsory nature of the processing for the purposes of establishing the relationship;
- to withdraw the consent given for non-compulsory data processing, without prejudice about legality of treatment, based on the consent given before the withdrawal.
- the processing of his/her personal data for the purpose of sending promotion of educational initiatives and cultural events of Politecnico.ù

These rights can be exercised by contacting [privacy@polimi.it](mailto:privacy@polimi.it).

If the interested party deems that his/her rights have been violated by the data controller and/or by a third party, s/he has the right to submit a complaint to the Data Protection Authority according to Article 77 of the GDPR.