



POLITECNICO
MILANO 1863

PRIVACY POLICY

UNDER ART. 13 OF REGULATION (EU) NO. 2016/679 OF 27 APRIL 2016

This privacy policy is issued under Art. 13 of Regulation (EU) no. 2016/679 of 27 April 2016 on the protection of individuals during personal data processing, personal data processing regulations and the free movement of such data.

This Privacy Policy refers to internal internships.

Data controller

Politecnico di Milano - General Director, delegated by the pro-tempore Rector - e-mail: dirgen@polimi.it.

Internal data processor

Dr Alessandra Moroni, Director of HR and Organisational Development Division, Politecnico di Milano, e-mail: alessandra.moroni@polimi.it.

Personal data will be processed by other authorised parties who will receive instructions for that purpose under applicable legislation.

Data protection officer and contacts

E-mail: privacy@polimi.it.

Data processing purposes and legal basis, data categories and storage period.

Under the relevant European and national legislation, we inform you that your personal data will be used for the following purposes:

- selection procedures and analysis of applications;
- internship relationship establishment;
- training project definition and implementation;
- coordination and internal management of training and orientation, curricular and extracurricular internships;
- management of internship-related administrative, legal, tax, welfare and salary aspects; for occupational health and safety (Legislative Decree 81/08); to manage organisational and production requirements, for the safety of the workplace and protection of the University's assets, including any electronic tools used to provide the service (PCs, smartphones, information systems, Internet, electronic mail, under the Regulations on the use of IT tools);
- production of video footage or photographs for purposes of information, University promotion, teaching, participation in extra projects, subject to consent at the time of filming;
- communication and promotion of additional internship or job positions;
- communication and promotion of networking events and initiatives;

For the above purposes, general data (personal, identification, contact, and bank data) will be processed under the principles laid down in the legislation on the protection of personal data, such as the principle of minimisation.

Legal basis for the lawful processing of the personal data is:

- ✓ **art. 6, paragraph 1(b) of the EU Regulation, "contract"**: as part of internships, the training project is a mutual agreement between the student, promoter and host institution, governed by an internship agreement and individual training projects. Processing personal data as part of a training project may include the collection of personal data, necessary to set up and manage the project and pay allowances. In Italy, these agreements are governed by Law 196/1997, its implementing Decree

142/1998, and regional regulations on extracurricular internships, as transposed by the guidelines of the State-Regions Conference of 25 May 2017;

- ✓ **art. 6, paragraph 1(c) of the EU Regulation, “legal obligation”:** applies when processing is required by specific legislation. For internships, universities are subject to regulatory obligations for record keeping and mandatory reporting to public bodies, as set out in Legislative Decree 81/2008 regarding safety at work and Legislative Decree 33/2013 for administrative transparency. Reporting to INAIL or social security bodies for the insurance management of interns are directly applicable legal obligations. For extracurricular internships, the regional regulations, as transposed by Decree of the Lombardy Regional Government 7763/2018, specify the documentation and reporting obligations for the management of training projects. These obligations justify processing such as the retention of documents for periods defined by local law.
- ✓ **art. 6, paragraph 1(e) of the EU regulation, “relevant public interest”:** this may apply to the processing of personal data as part of social inclusion programmes, monitoring the effectiveness of internships or evaluations of training project outcomes. For public universities, this legal basis is often supported by national regulations, such as Legislative Decree 165/2001, which regulates the organisation of public work and institutional activities. However, for processing directly related to the internship management, the contract remains the main legal basis.

Personal data will be kept for a period that does not exceed the achievement of the purposes for which it was processed (“retention limitation principle”). Documentation is stored under Presidential Decree no. 445/2000.

- For the selection and analysis of applications, data will be kept for the selection process duration;
- For the establishment, completion and management of training projects, data will be kept for the internship duration, including any extensions;
- For historical research, statistics and archiving, data will be kept indefinitely;
- For communication and promotion of further internship or work placements, events and networking initiatives, data will be stored for five years.

Nature of data

The provision of the data required for the above purposes is optional. Without the requested data, the planned services/activities cannot be guaranteed.

Data processing methods

Processing for the purposes specified above may be carried out on paper and digitally, manually or electronically.

Data is stored in paper archives for the processing duration and in digital format indefinitely under the obligations of transparency and proper functioning of the public administration.

Duly authorised persons are entitled to access the data acquired for the above purposes.

Categories of recipients

For the above purposes, data may be disclosed to public or private entities, companies or individuals that provide internal or external services on the Controller’s behalf.

Politecnico di Milano may disclose personal data to:

- Organisations promoting internships, such as:
 - Educational institutions, ITS foundations, University Institutions including AFAM;
 - Training institutions accredited to education and vocational training services under Regional Law 19/2007;
 - Employment centres;

- regionally accredited for employment services under Regional Law no. 22/2006;
 - regionally accredited to employment services under Regional Law 22/2006, including the
 - regional special authorisations, as provided for in Decree of the Regional Government no. 4561 of 18 April 2007;
 - therapeutic communities and social cooperatives, provided they are registered in the specific regional registers,
 - for the benefit of disabled and disadvantaged individuals who are recipients of the services they provide.
- INAIL;
 - Insurance companies;
 - ANPAL;
 - Italian Revenue Agency;
 - Region where the public body or the host company is based.

Transferring data to non-EU countries or international Organisations

Personal data will be processed by the Data Controller within the European Union.

If for technical or operational reasons it becomes necessary to use parties located outside the European Union, or transfer some of the data collected to technical systems and services managed in the cloud and located outside the European Union, the processing will be regulated under the provisions of Chapter V of the EU Regulations and authorised based on EU decisions.

All necessary measures will be taken to ensure the highest level of protection for personal data during transfers, which will be based on:

- a) adequacy decisions by the European Commission that the recipient country provides an adequate level of data protection;
- b) adequate guarantees provided by the recipient country, under art. 46 of the EU Regulation;
- c) the adoption of Binding Corporate Rules (BCRs)

Data subject rights

Data subjects may ask the following from the Data Controller:

- confirmation of whether their personal data is being processed.
- access to their personal data and related information; correction of inaccurate data or completion of incomplete data; erasure of personal data (under the conditions specified in Art. 17, paragraph 1 of the Regulation and the exceptions in paragraph 3 of that Article); personal data processing restriction (if any of the circumstances specified in art. 18, paragraph 1 of the Regulation apply), transformation of data into anonymous form or blocking data processed unlawfully, including data no longer required for the purposes for which it was collected or processed.

Data subjects may partly or fully oppose data processing, for legitimate reasons, even if related to the original purpose of data collection.

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

If you believe that your rights have been violated by the data controller or a third party, you can lodge a complaint with the Data Protection Authority, or another relevant supervisory authority under the Regulation.

Milan, January 2025.