



**POLITECNICO**  
MILANO 1863

## **PRIVACY POLICY AND DECLARATION OF CONSENT TO PERSONAL DATA PROCESSING PURSUANT TO ART. 13 OF REGULATION EU NO. 679/2016 OF 27 APRIL 2016**

This privacy policy in force is issued in accordance with Art. 13 of Regulation EU no. 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 laws on personal data processing and on the free movement of such data.

This policy is produced in respect of the mission of the FUNDRAISING AND ALUMNI UNIT – RELATIONS WITH ALUMNI AND DONORS service which involves the establishment, implementation and coordination of all networking and contact activities with Politecnico di Milano alumni as well as the development of fundraising activities for the purpose of obtaining donations from private entities and companies to finance the Politecnico.

### **Data Controller**

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

### **Internal Data Processor**

Mr Federico Colombo, Manager of the Research, Innovation and Business Relationships area- tel. 02.2399.1 email: [sostieni@polimi.it](mailto:sostieni@polimi.it).

The personal data will be processed by additional authorised parties who will receive instructions for that purpose in respect of applicable legislation.

### **Data Protection Officer and points of contact**

Mr Vincenzo Del Core - [privacy@polimi.it](mailto:privacy@polimi.it) - tel.: 0223999378.

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

For the purposes of applying the relevant European and national legislation (Reg. EU 679/2016, hereafter Regulation), we inform you that your personal data will be used for the following purposes:

<b>Purposes of personal data processing</b>	<b>Legal basis of processing</b>	<b>Categories of personal data processed</b>
<b>Purpose 1:</b> promotion activity of initiatives and awareness-raising campaigns for supporters and donors of Politecnico di Milano to raise funds for teaching, research and scientific promotion activities and for the so-called third mission, sending communications and private informative material to supporters and donors in paper and digital format.	<b>Public interest in</b> accordance with Art. 6 letter e) of the GDPR; Art. 7 of Italian Law 168 of 1989, “autonomous forms of funding, such as voluntary contributions, business income, returns, profits and alienations of property, acts of charity and fees from contracts and conventions.”	<ul style="list-style-type: none"><li>• Identification data</li><li>• Contact data</li><li>• Personal data</li><li>• Tax data</li><li>• Financial data</li></ul>



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<b>Purpose 2:</b> management of transactions related and consequent to donations.	<b>Performance of the contract</b> to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract in accordance with Art. 6 par. 1, letter b) of Regulation EU	<ul style="list-style-type: none"><li>• Identification data</li><li>• Contact data</li><li>• Personal data</li><li>• Tax data</li><li>• Financial data</li></ul>
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**It is noted that, during the administrative procedures linked to donations, the data subject will always be able to express, by specific authorisation, free consent to the publication of his/her name and surname alongside the donation made. Anonymity will always be available as a preferred option.**

**During special events organised by Politecnico di Milano to promote Fundraising, photos and audio-video recordings may be taken of the participants, subject to providing an adequate privacy policy prepared in accordance with Art.13 of the EU Regulation and a declaration on the use of images and/or audio/video recordings.**

Images and/or audio/video recordings collected in fulfilling Purpose 1 may be disseminated pursuant to Italian Law no. 150/2000, "Rules on information and communication activities of public administrations", on institutional websites as well as through social media channels (by way of example but without limitation, Facebook, Twitter, YouTube).

Lastly, we note that the communication and/or dissemination of images and/or audio/video recordings entails the granting of a non-exclusive licence, of unlimited duration and for the whole world, which is transferable to third parties. This licence includes the rights set out in Articles 12 et seq. of Italian Law no. 633/1941 including, by way of example but not exhaustively, the right of publication, the right of reproduction in any way or form, the right of transcription, editing, adaptation, processing and reduction; the right to communicate and distribute to the public, including the rights of projection, transmission and broadcasting (purely by way of example via IPTV, mobile terminals, VOIP, digital channels, etc.), including in summary and/or reduced form, using any technical means, the right to keep a copy of the images, including in electronic format and on any technological device that is known or may be invented in future, for the purposes and within the limits defined above. The use of the images does not give any entitlement to payment.

In any case, this excludes any use of the picture/portrayal that may cause prejudice to the honour, reputation or dignity of the person portrayed, photographed or recorded.

#### **Nature of Data**

The provision of data is optional. Any refusal to provide the data makes it impossible to carry out the performances.

#### **Processing Methods**

Processing for the aforementioned Purpose may be carried out both on paper and digitally, manually and/or with electronic or automated tools, including in-house or external databases. Furthermore, processed data are stored in paper archives for the duration of the processing and in digital format for an indefinite period in accordance with applicable obligations on transparency and on the proper functioning of the public administration.

In particular, the personal data are collected by the following methods:

- Data provided directly by the data subject:** personal data are collected directly from the data subject when he/she requests information on the activities, during the recording of an event, to



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make a donation, by registering to the social media channels of Politecnico di Milano or in another manner that involves the direct communication of personal information. This type of information can also be collected if it is voluntarily made public by the data subject when interacting with the University departments.

- b. Data provided indirectly by the data subject:** personal data of the data subject may also be shared with Politecnico di Milano by third parties, e.g. organisers of independent events or fundraising websites or organisations and associations affiliated with the University (e.g. Politecnico di Milano Alumni Association). Politecnico di Milano may receive information on the data subject from foundations, associations and institutions connected with the University's initiatives and missions. These independent third parties will provide the data only if the data subject has indicated the desire to support Politecnico di Milano and with his/her consent. Please therefore refer to the privacy policy provided by the third parties involved.

Third parties are also contacted in order to obtain data in support of our activities. This may include the processing of funds raised via credit card or PayPal and the arrangement of direct debits.

- c. Data from other public sources:** apart from information provided directly or indirectly, personal data may also be collected from publicly available sources, e.g. from reliable daily newspapers, company websites or social networks.

Only duly authorised persons are entitled to access the data acquired.

### **Categories of Recipients**

The personal data collected may be communicated to:

- natural and/or legal persons, public and/or private, to associations and foundations connected with Politecnico di Milano which share the purposes of the university, when the communication is necessary or functional to the establishment and management of relationships to develop a fundraising link with donors and benefactors;
- Politecnico di Milano Alumni Association;
- legal advisors to obtain legal consultancy;
- persons to whom the right of access to those data is granted by virtue of regulatory measures;
- persons authorised by Politecnico di Milano in the capacity of Controller, with reference to processing concerning staff management (Designated Persons, Processing Officers and System Administrators);
- Judicial authority, in order to exercise or defend a legal claim, even by a third party.

In particular, your personal data may also be communicated to other public administrations, even anonymously, if they need to process the data for any procedures under their own institutional remit, as well as to all public parties to which, in the presence of the respective conditions, the communication is required mandatorily by provisions of European law, standards or regulations, as well as insurance bodies in relation to claims for any accidents that may occur.

### **Data Storage Period**

The data collected will be stored for the entire time necessary to allow for the management of the promotion services, but they will not be stored for longer than is necessary for processing. Legal obligations and tax and accounting rules will be taken into consideration. In addition, Politecnico di Milano will retain the personal data according to storage timescales as part of its broader legal and



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regulatory obligations, even if that information is no longer necessary for purposes of promotion, development or fundraising.

### **Transfer to Non-EU Countries**

The personal data will not be transferred in any way to countries outside the EU.

For activities or special events that may require the transfer of personal data to non-EU countries or to an international organisation, appropriate authorisation will be requested from the data subject.

### **Rights of Data Subjects**

As the data subject, you may at any time request from the Controller:

- confirmation of the existence or otherwise of personal data concerning you;
- access to your personal data and information relating to them, the correction of inaccurate data or the completion of incomplete data, the erasure of personal data pertaining to you (in the presence of one of the conditions indicated in Art. 17, paragraph 1 of the Regulation and in respect of the exceptions envisaged by paragraph 3 of that Article); the restriction of processing of your personal data (in the presence of one of the circumstances indicated in Art. 18, paragraph 1 of the Regulation), the transformation into anonymous form or block on data processed in violation of the law, including data whose storage is no longer necessary for the purposes for which it was collected or processed.

As the data subject, you also have the right to object in full or in part:

- on legitimate grounds, to the processing of personal data concerning you, even if relevant to the purpose for which the data was collected;
- to the processing of your personal data for the purposes of sending promotional material on training initiatives and cultural events of Politecnico di Milano.

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

If you believe that your rights have been infringed by the Controller and/or by a third party, you are entitled to lodge a complaint with the Italian Data Protection Authority and/or other competent supervisory authority pursuant to the Regulation.