



POLITECNICO
MILANO 1863

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

This policy is issued under 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 respect of the laws on personal data processing and on the free movement of such data.

Data Controller

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

Internal data processor

Alessandra Moroni, Head of Human Resources and Organisation, Piazza Leonardo Da Vinci 32, Milan (MI) - Ph. 02 23992153, e-mail alessandra.moroni@polimi.it.

The data will be processed by other authorised persons who will receive instructions for that purpose in respect of current legislation.

Data protection Officer and contacts

Vincenzo Del Core, email: privacy@polimi.it - Ph.: +39 02 23999378.

Data processing purposes, legal basis, data categories and retention period

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

Data processing purposes	Processing legal basis	Categories of personal data processed	Personal data retention period
Purpose 1 Registration and participation in training activities.	Public interest (Art. 6, paragraph 1, letter e) of Regulation EU).	<ul style="list-style-type: none">• Identification data• Personal details• E-mail addresses• Relevant facility	36 months
Purpose 2 Participation in practical learning initiatives and online exercises.	Public interest (Art. 6, paragraph 1, letter e) of Regulation EU).	<ul style="list-style-type: none">• Identification data• Personal details• E-mail addresses• Relevant facility	36 months



POLITECNICO
MILANO 1863

Purpose 3 Statistical purposes, storage and archiving.	Public interest (Art. 6, paragraph 1, letter e) of Regulation EU).	<ul style="list-style-type: none">• Identification data• Personal details• E-mail addresses• Relevant facility	The data necessary for the correct functioning of the public administration will be archived and stored indefinitely, in respect of principles of transparency, lawfulness, proportionality and minimisation.
---	--	---	---

Nature of the data

The provision of data is mandatory. Refusal to provide the data makes it impossible to carry out the intended purposes.

Special categories of data

Any personal data belonging to special categories under Art. 9 of the Regulation, such as:

- personal data relating to the employment relationship;

is processed, for the purpose indicated in the table, to allow the data subject:

- to use the services of Politecnico di Milano based upon the declared requirements;
- to obtain contributions and study scholarships;
- for career management.

Processing methods

Processing for the above purposes may be carried out on paper and digitally, manually or with electronic or automated tools, or external databases owned by the supplier Cyberg Guru. The 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 aforementioned purposes.

The data will be processed in statistical form by the external data processor Cyber Guru using an automated process, in aggregated and anonymised format, including for profiling purposes.

The Data Controller will carry out automated and non-automated processing of data provided, starting from the delivery of the programme and education activities, related to the professional career and exclusively for the purposes related to the performance of institutional tasks of public interest.

Categories of recipients

For the above purposes, the data may be communicated to Cyber Guru, or companies or persons, in Italy and abroad, that provide services on behalf of the Controller. The supplier Cyber Guru will receive the personal data processed exclusively for the purposes indicated and expressed in the contract and will be appointed as an external data processor under Art. 28 of the EU Regulation.



POLITECNICO
MILANO 1863

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.

Transfer to non-EU countries or international Organisations

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

Data subject rights

As the data subject, you may 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 rectification of inaccurate data or completion of incomplete data; the erasure of personal data relating to you (in the presence of one of the conditions indicated in Art. 17, paragraph 1 of the Regulation and in compliance with the exceptions provided for in paragraph 3 of the same article); limit the processing of your personal data (under one of the cases 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.

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.