



PRIVACY POLICY FOR THE COLLETION AND PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLE 13 OF REGULATION (EU) 679/2016 OF 27 APRIL 2016

This privacy policy is issued pursuant to Art. 13 of Regulation (EU) 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 legislation on the processing of personal data, as well as the free movement of such data.

Data Controller

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

Data Protection Officer and contact details

E-mail: privacy@polimi.it - Tel. 02 23999378.

Purpose of the processing, legal basis, categories of data and retention period.

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

Intended purpose of the personal data processing	Legal basis of the processing	Categories of personal data subject to processing	Retention period of personal data
Purpose 1 Protection of privacy rights.	Legal obligation (art. 6, par. 1, letter a) of the EU Regulation).	<ul style="list-style-type: none"> • Personal data • Identifying data • Contact details • Academic information • Common data related to administrative needs 	The data will be kept for an unlimited period of time for the Public Administration to fulfil related obligations.

Nature of the data

The provision of the data requested for Purpose 1 is optional. In the event of failure to provide the data requested, the planned services/activities cannot be guaranteed.

Processing methods

The processing (one ore more) carried out for the purposes described above can be carried out both on paper and digitally, manually and/or using electronic or, in any case, automated tools.

Data may also be stored in paper archives for the duration of the course/activity [specify]/processing and indefinitely in digital format in view of the obligations of transparency and the correct operation of public administration.

The data acquired for purpose 1 shall only be accessed by duly authorized personnel.



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Categories of recipients

In relation to the purposes indicated, personal data may be disclosed to the following public and/or private entities, or may be disclosed to companies and/or persons who provide services, including externally, on behalf of the Data Controller. In particular, the data collected may be transmitted to the service providers necessary for carrying out the initiative, which shall be formally appointed by the Politecnico di Milano as external Data Processors pursuant to Art. 28 of the EU Regulation.

Your personal data may also be disclosed to other public administrations, including in anonymous form in the event that such administrations are obliged to process these data for any proceedings within their institutional competence, as well as to all public entities to which, under the relevant conditions, disclosure is legally required under the provisions of European system, laws or regulations, as well as insurance bodies for any accident reports.

Specifically, the following parties are recognised as the recipients of your personal data:

- Data Protection Authority;
- Liguria Digitale - Appointed as Data Processor pursuant to art. 28 of the EU Regulation;
- National and/or international universities, in the case of partnerships for research projects or other initiatives.

Transfer to non-EU countries or international organizations

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

Should it become necessary, for technical and/or operational reasons, to make use of parties located outside of the European Union, or should it become necessary to transfer some of the data collected to technical systems and services managed in the cloud and located outside of the European Union, the processing shall be regulated in accordance with the provisions of Chapter V of the EU Regulation and authorised on the basis of specific decisions by the European Union.

All of the necessary precautions will therefore be implemented in order to ensure the utmost protection of the personal data, the transfer being based:

- a) on adequacy decisions of third country recipients as expressed by the European Commission;
- b) on appropriate safeguards provided by the third party recipient pursuant to Article 46 of the EU Regulation;
- c) on the adoption of binding corporate rules .

Rights of data subjects

As a data subject, you can ask the Data Controller for the following at any time:

- confirmation of any personal data held concerning you;
- access to your personal data and related information; the correction of inaccurate data or the completion of incomplete data; the cancellation of personal data concerning you (where any of the conditions indicated in Art. 17, paragraph 1 of the Regulation applies and in compliance with the exceptions provided for in paragraph 3 of the same article); the restriction of the processing of your personal data (where one of the conditions indicated in Art. 18, paragraph 1 of the Regulation applies), the transformation into anonymous form or the blocking of data processed in violation of the law, including those that do not need to be kept for the purposes for which the data were collected or subsequently processed;

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



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- for legitimate reasons, to the processing of personal data concerning you, even if pertinent to the purpose of the collection;
- to the processing of personal data concerning you for the purpose of sending advertisements on courses and cultural events at the Politecnico di Milano.

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

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

Milan, September 2023.