



## **PRIVACY POLICY PURSUANT TO ARTICLE 13 OF REGULATION (EU) NO 679/2016 OF 27 APRIL 2016**

This privacy policy is issued pursuant to Art. 13 of Regulation (EU) 2016/679 hereinafter the “EU Regulation”) on the protection of natural persons with regard to the processing of personal data and compliance with the legislation on the processing of personal data and the free movement of such data. This privacy policy is exclusively related to the administrative management of continuing education events held by Politecnico di Milano.

### **Data Controller**

The Data Controller is Politecnico di Milano - General Director delegated by the pro tempore Rector - contact: [dirgen@polimi.it](mailto:dirgen@polimi.it).

### **Internal Data Processor**

Dr Federico Colombo - Head of Research, Innovation and Corporate Relations, Piazza Leonardo da Vinci 32, Milan (MI) - tel. 02 23993923, email: [infoprogettiformazione@polimi.it](mailto:infoprogettiformazione@polimi.it).

The data shall be processed by other persons authorised and instructed for this purpose in accordance with current legislation.

### **Data Protection Officer and contact details**

Email: [privacy@polimi.it](mailto:privacy@polimi.it).

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

For the purposes of the application of the relevant European and national legislation (EU Regulation), we inform you that your personal data will be used for the following purposes:

<b>Intended purpose of the personal data processing</b>	<b>Legal basis of the processing</b>	<b>Categories of personal data subject to processing</b>	<b>Retention period of personal data</b>
<b>Purpose 1</b> Ensuring participation in the selection and, in case of success, inclusion in the ranking list.	Public interest (Art. 6, para. 1 letter e) of the EU Regulation.	<ul style="list-style-type: none"><li>• Personal details</li><li>• Identifying data</li><li>• Contact details</li><li>• Academic information</li></ul>	Retention unlimited in time, in the same way as archiving obligations provided for by current legislation.
<b>Purpose 2</b> Carrying out administrative tasks related to selection for events.	Public interest (Art. 6, para. 1 letter e) of the EU Regulation.	<ul style="list-style-type: none"><li>• Personal details</li><li>• Identifying data</li><li>• Contact details</li><li>• Academic information</li></ul>	Retention unlimited in time, in the same way as archiving obligations provided for by current legislation.



<p><b>Purpose 3</b> Carrying out administrative tasks related to educational activities, invoicing the registration fee and reporting to the relevant offices.</p>	<p>Public interest (Art. 6, para. 1 letter e) of the EU Regulation.</p>	<ul style="list-style-type: none"> <li>• Personal details</li> <li>• Identifying data</li> <li>• Contact details</li> <li>• Academic information</li> <li>• Tax information</li> <li>• Bank details</li> <li>• PagoPA payment data</li> </ul>	<p>Retention unlimited in time, in the same way as archiving obligations provided for by current legislation.</p>
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Additional information on the promotion and communication purposes related to continuing education activities is presented in the Privacy Policy issued by the managing body in charge of the promotion.

### Nature of the data

Provision of the requested data is mandatory. Refusal to provide the data prevents us from providing the services.

### Processing methods

The processing carried out for the above stated purposes, i.e., to fulfil the institutional activities of Politecnico di Milano (art. 6, par. 1, letter e, of the EU Regulation) and for subsequent statistical activities, may be carried out either on paper or digital support, manually and/or with electronic or other automatic tools.

The data may be stored in paper archives for the duration of the event and indefinitely in digital format in view of transparency obligations and the correct operation of public administration.

The data acquired for the aforementioned purposes shall only be accessed by duly authorised personnel.

### Categories of recipients

The data processed for the purposes outlined above shall be disclosed or shall in any case be accessible to professor of continuing education events and employees and collaborators assigned to the relevant Politecnico di Milano offices, who, as authorized data processors, shall be duly and adequately instructed by the Data Controller.

In relation to the purposes indicated, personal data may be disclosed to the categories of public and/or private entities mentioned below, or may be disclosed to companies and/or persons based in Italy or abroad that provide services, including externally, on behalf of the Data Controller. In particular, personal data may also be disclosed to other public administrations, including in anonymous form in the event that the latter are obliged to process such data for any procedures within their institutional competence, as well as to any public entities to which, under the relevant conditions, disclosure is legally required by the provisions of European law other, laws or regulations, in addition to insurance bodies for any accident reports.

In particular, for continuing education events, the personal data processed will be passed on to the following third parties:

- facilities belonging to Politecnico di Milano, including Research Centres and Foundations;
- Managing bodies internal or external to Politecnico di Milano, for sending communications;
- entities internal or external to Politecnico di Milano which act as Data Processor pursuant to Art. 28 of the EU Regulation;



**POLITECNICO**  
MILANO 1863

- public and private entities in order to facilitate the orientation, education, training and professional integration of students and graduates from the University;
- Public and private entities requesting confirmation of self-certifications received, pursuant to the 'Consolidated law on law and regulatory provisions on administrative documents' - Presidential Decree No. 445 of 28 December 2000, as amended by Article 15 of Law No. 183 of 2011;
- Professional associations accrediting continuing education events;
- Partners supporting the Data Controller in the management of the educational course.

### **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 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, the 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 of recipient third countries expressed by the European Commission;
- b) appropriate guarantees provided by the recipient third party under Art. 46 of the Regulation;
- c) the adoption of *Binding Corporate Rules*.

### **Rights of the data subject**

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 rectification of inaccurate data or the completion of incomplete data; the deletion of personal data concerning you (where any of the conditions indicated in Art. 17, paragraph 1 of the Regulation apply 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); 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:

- 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 educational events at Politecnico di Milano.

These rights can be exercised by contacting [privacy@polimi.it](mailto: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 (in Italy, [www.garanteprivacy.it](http://www.garanteprivacy.it)) and/or other competent supervisory authority pursuant to the Regulation.