



SECOND LEVEL PRIVACY POLICY ON PERSONAL DATA PROCESSING IN THE MANAGEMENT OF MAIL AND PROTOCOL SERVICES

This privacy policy is issued in accordance with 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 respect of the legislation on the processing of personal data and on the free movement of such data.

Data controller

The Data Controller of the Politecnico di Milano is the Director General, delegated by the acting Rector – e-mail: dirgen@polimi.it .

Internal data processor

Mr. Fabrizio Pedranzini, Head of the ICT Services Area, tel. 02.2399.2377 – email fabrizio.pedranzini@polimi.it .

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

Data Protection Officer and points of contact

Mr. Vincenzo Del Core, privacy@polimi.it - tel.: 0223999378.

Purposes of processing, legal basis, categories of data and storage period For the purposes of the application of the European and national legislation in that regard (Reg. EU 679/2016, hereafter Regulation), we inform you that your personal data will be used for the following purposes:

Purposes of personal data processing	Legal basis of processing	Categories of personal data processed	Data storage period
Purpose 1: provision of management services of tracked mail arriving at the Politecnico, delivered by public or private carriers, associating the data of the external sender and the internal recipient.	To fulfil the institutional activity of Politecnico di Milano (Art. 6, paragraph 1, letter e of Regulation EU).	<ul style="list-style-type: none">• Personal details (name and surname);• Contact details (email address, internal telephone numbers);• Career details. The data processed are collected in semi-automated form in a dedicated database.	The data collected will be stored for a period of 2 years.



<p>Purpose 2: provision of document and IT protocol management services, as envisaged by the Digital Administration Code (DAC).</p>	<p>To fulfil the institutional activity of Politecnico di Milano (Art. 6, paragraph 1, letter e of Regulation EU).</p>	<ul style="list-style-type: none">• Personal details (name and surname, date and place of birth, tax code, residence);• Career data;• Tax details. <p>Subject and content of registration, any annexes even of health nature.</p> <p>The data processed are collected in semi-automated form (Titulus SW).</p>	<p>The data of the protocol register will be stored for an unlimited period.</p> <p>The documentation associated with the registrations will be stored for different periods, according to what is laid down by existing legislation.</p>
<p>Purpose 3: provision of document management services as part of the storage archive.</p>	<p>To fulfil the institutional activity of Politecnico di Milano (Art. 6, paragraph 1, letter e of Regulation EU).</p>	<ul style="list-style-type: none">• Personal details (name and surname, date and place of birth, tax code, residence);• Career data;• Tax details. <p>Subject and content of the request and its purpose.</p> <p>The data processed are collected in semi-automated form (Titulus SW).</p>	<p>The details of document access requests to the archive are stored in accordance with what is laid down by existing legislation.</p>

Nature of data

In protocol registrations, the possibility of identifying the sender is mandatory, otherwise the request received will be irrelevant and consequently not registered.

Processing methods

The processing performed for the purposes indicated above may be carried out both on paper and digitally, manually and/or using electronic or, in any case, automated tools, including the in-house database known as Anagrafica Unica, the eW tracking SW of the company EWBM, the Titulus and CONSERVA SW of CINECA. They are also stored in digital format on an open-ended basis based upon the obligations of transparency and proper functioning of the public administration.

Access to data acquired for the purposes indicated above is permitted only to duly authorised personnel.

The email addresses are used for the courtesy notification of the delivery of tracked mail, and of the assignment as Head of the Administrative Procedure (HAP) in the case of protocol registration.



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The existing legislation on personal data protection and on personal data processing in electronic format and, more particularly, the indications of the Data Protection Supervisory Authority on the use of courtesy (notification) emails by public entities allow the latter to send emails for institutional communications as part of their duties, without requesting the provision of consent, and only for purposes related to a specific request or indication of the data subject.

Categories of recipients

In relation to the purposes indicated above, the data may be communicated to the following public and/or private entities, or they may be communicated to companies and/or persons, both in Italy and abroad, that provide services, even external, on behalf of the Controller for the provision of mail and protocol services and for the management of automation software: CAeB – Cooperativa Archivistica e Bibliotecaria, EWBM, and CINECA, all appointed as external data processors.

In particular, the personal data may also be communicated to other public administrations, even anonymously if the latter need to process such data for purposes within their institutional remit, as well as to all those public entities to which (if the necessary preconditions are met) the communication of personal data is required mandatorily by EU rules, laws or regulations, as well as to insurance companies when accident files are opened.

Transfer to non-EU countries

The personal data may be transferred abroad, in accordance with the Regulation, even to countries outside the European Union, when this is necessary for one of the purposes set out in this privacy policy. The transfer to non-EU countries, in addition to cases where this is guaranteed by adequacy decisions of the European Commission, is carried out in such a way as to provide suitable and appropriate safeguards in accordance with Articles 46 or 47 or 49 of the Regulation.

Rights of data subjects

The data subject, in relation to the personal data subject to this privacy policy, may exercise the rights envisaged by Regulation EU, indicated below:

- right of access by the data subject [Art. 15 of Regulation EU] (the possibility of being informed of processing carried out on your Personal Data and possibly to receive a copy of them);
- right to rectification of your Personal Data [Art. 16 of Regulation EU] (the data subject has the right to the rectification of inaccurate personal data relating to you);
- right to erasure of your Personal Data without undue delay (“right to be forgotten”) [Art. 17 of Regulation EU] (the data subject has, and will have, the right to the erasure of your personal data);
- right to restriction of processing of your Personal Data in the cases envisaged by Art. 18 of Regulation EU, including in the case of unlawful processing or where the accuracy of the personal data is contested by the data subject [Art. 18 of Regulation EU];
- right to object to the processing of your Personal Data [Art. 21 of Regulation EU] (the data subject has, and will have, the right to object to the processing of your personal data);
- right not to be subject to a decision based solely on automated processing [Art. 22 of Regulation EU] (the data subject has, and will have, the right not to be subject to a decision based solely on automated processing).

Further information on the rights of the data subject may be obtained on the website www.garanteprivacy.it.

Politecnico di Milano, in compliance with Art. 19 of Regulation EU, informs recipients to which the personal data have been communicated of any requested rectifications, erasures or restrictions of the processing, if this is possible.

With reference to the purposes indicated above, the data subject has the right to withdraw, at any time, the consent to processing of identification and personal data by sending an email to: privacy@polimi.it.



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Right to lodge a complaint

If the data subject believes that your rights have been compromised, you have the right to lodge a complaint with the Data Protection Supervisory Authority, by following the instructions indicated by that Authority at the following internet address www.garanteprivacy.it .