



POLITECNICO
MILANO 1863

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

This current 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 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 - contact: dirgen@polimi.it.

Internal Data Processor

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

The personal data will be processed by other authorised parties who will receive instructions for that purpose under current legislation.

Data Protection Officer and contact details

Vincenzo Del Core, email: privacy@polimi.it - Tel.: +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. 2016/679, hereafter, Regulation), we inform you that your personal data will be used for the following purposes:

Data processing purposes	Legal basis of processing	Personal data categories	Personal data storage period
Purpose 1 Registration and participation in training activities.	Public interest (Art. 6, paragraph 1, letter e) of the EU Regulation).	<ul style="list-style-type: none">• Identification data• Personal details• Email address and work telephone number;• Relevant facility	36 months
Purpose 2 Participation in training initiatives and practical exercises electronically and online.	Public interest (Art. 6, paragraph 1, letter e) of the EU Regulation).	<ul style="list-style-type: none">• Identification data• Personal details• E-mail addresses• Relevant facility	36 months



<p>Purpose 3 Statistical purposes, storage and archiving.</p>	<p>Public interest (Art. 6, paragraph 1, letter e) of the EU Regulation).</p>	<ul style="list-style-type: none"> • Identification details • Personal details • E-mail addresses • Relevant facility 	<p>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.</p>
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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;
- are 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 and/or external databases owned by the supplier Cyberg Guru. Short communications may also be sent by SMS to persons in possession of a company mobile phone, with the aim of training personnel in relation to security.

The data are stored in paper archives for the processing duration and in digital format indefinitely based upon 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.

In particular, the Data Controller will process, even in an automated manner, the data provided, starting from the delivery of the programme and activities related to the conduct of training, related to the professional career and exclusively for the purposes related to the performance of institutional duties of public interest for which it is responsible.

Categories of Recipients

In relation to the indicated purposes, the data may be communicated to Cyber Guru or they may be communicated to companies and/or persons, both in Italy and abroad, that provide services, even external, on behalf of



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the Data 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.

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.

Rights of the data subjects

As the data subject, you may at any time ask the Controller for:

- confirmation of the existence or your personal data;
- access to your personal data and related information; correction of inaccurate data or supplementation of incomplete data; erasure of your personal data (under 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); restrict the processing of your personal data (under one of the cases indicated in art. 18, paragraph 1 of the Regulation), 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 they were collected or processed;

As data subject, you have the right to partly or fully object:

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

These rights can 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 may lodge a complaint with the Data Protection Authority, or another relevant supervisory authority under the Regulation.