



PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLE 13 OF REGULATION (EU) NO. 679/2016

This notice is issued pursuant to Article 13 of Regulation (EU) 2016/679 of 27 April 2016 (hereinafter “EU Regulation”) concerning the protection of natural persons with regard to the processing of personal data and the free movement of such data.

In particular, this Notice refers to the activities of litigation management, legal advice, and debt recovery carried out by the University Legal Office.

Data Controller

Politecnico di Milano – General Director by delegation of the acting Rector – contact: dirgen@polimi.it.

Data Protection Officer and Contact Points

Email: privacy@polimi.it.

Purpose of Processing, Legal Basis, Categories of Data, and Retention Period

For the purposes of applying European and national legislation, please be informed that your personal data will be used for the following purposes:

Purpose of processing	Legal basis	Categories of personal data processed	Retention period
Purpose 1 Management of disputes before various judicial authorities.	Legal obligation (Art. 6(1)(c) of the EU Regulation). Public interest (Art. 6(1)(e) and Art. 9(2)(f) and (g) of the EU Regulation).	<ul style="list-style-type: none">• Personal data• Career data• Identification data• Contact data• Judicial data• Union, political, religious affiliations• Health data• Ethnic or racial origin	Data collected will be retained for 10 years. Indefinite retention is provided for archival purposes.
Purpose 2 Legal advisory activities.	Public interest (Art. 6(1)(e) and Art. 9(2)(f) and (g) of the EU Regulation).	<ul style="list-style-type: none">• Personal data• Career data• Identification data• Contact data• Judicial data• Union, political, religious affiliations• Health data• Ethnic or racial origin	Data collected will be retained for 10 years. Indefinite retention is provided for archival purposes.
Purpose 3 Debt recovery activities arising from contract/consultancy relationships under Art. 66 of Presidential Decree No. 382/80 against defaulting third parties.	Legal obligation (Art. 6(1)(c) of the EU Regulation).	<ul style="list-style-type: none">• Personal data• Career data• Identification data• Contact data• Judicial data	Data collected will be retained for 10 years. Indefinite retention is provided for archival purposes.



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Nature of the Data

The provision of data required for purposes 1, 2, and 3 is mandatory.

In the absence of the requested data, the services/activities provided cannot be guaranteed.

Processing Methods

Processing for the above purposes may be carried out using digital and/or electronic or otherwise automated tools, including ticketing applications.

In particular, personal data will be processed using IT tools/applications with organizational and processing logic strictly related to the above purposes and in a manner that ensures the security, integrity, and confidentiality of the data processed.

Access to the data acquired for the above purposes is permitted to duly authorized personnel.

Special Categories of Data

For purposes 1, 2, and 3 listed in the table, the processing of personal data belonging to special categories pursuant to Art. 9 of the EU Regulation is envisaged, specifically:

- Data relating to health;
- Personal data relating to criminal convictions and offences (Art. 10);
- Data relating to union membership;
- Data revealing ethnic or racial origin.

Categories of Recipients

In relation to the stated purposes, the data may be communicated to the following public and/or private entities, or to companies and/or individuals providing services, including external ones, on behalf of the Controller.

In particular, the data collected may be transmitted to service providers necessary for the execution of the activities provided for the stated purposes, who are formally qualified and appointed by Politecnico di Milano as “Data Processors pursuant to Art. 28 of the EU Regulation.”

Furthermore, personal data may be communicated to other public administrations, including in anonymous form, if they must process the same for proceedings within their institutional competence, as well as to all public entities to whom, under the relevant conditions, communication is mandatory under European law, statutory or regulatory provisions.

Specifically, the recognized recipients of personal data are:

- State Legal Service;
- Prefecture;
- Public Prosecutor’s Office;
- Police Headquarters;
- Ministry of University and Research;
- Suppliers;
- Public and private contractors for third-party contracts;
- Other parties legitimately involved in the investigation and management of disputes (e.g., judicial authorities).

Personal data may also be processed by the company 4C s.r.l. as Data Processor pursuant to Art. 28 of the EU Regulation, exclusively for the provision of the “TickTool” service and related services (configuration, training, maintenance, support) used within the scope of the stated purposes.

Transfer to Non-EU Countries or International Organizations

Personal data will be processed by the Controller within the territory of the European Union. Should it become necessary for technical and/or operational reasons to use entities located outside the



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European Union, or to transfer some of the collected data to technical systems and services managed in the cloud and located outside the EU, processing will be regulated in accordance with Chapter V of the EU Regulation and authorized based on specific decisions of the European Union. All necessary precautions will be taken to ensure the fullest protection of personal data, basing the transfer on:

- a) adequacy decisions of the recipient third countries issued by the European Commission;
- b) appropriate safeguards provided by the third-party recipient under Art. 46 of the EU Regulation;
- c) adoption of *binding corporate rules*.

Data Subject Rights

As a data subject, you may at any time request from the Controller:

- Confirmation as to whether or not personal data concerning you exists;
- Access to your personal data and related information; rectification of inaccurate data or completion of incomplete data; erasure of personal data concerning you (upon the occurrence of one of the conditions set out in Art. 17(1) of the Regulation and subject to the exceptions provided in paragraph 3 of the same article); restriction of processing of your personal data (in the cases provided for in Art. 18(1) of the Regulation); anonymization or blocking of data processed unlawfully, including data whose retention is unnecessary 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 relevant to the purpose of collection.

These rights may be exercised by contacting: privacy@polimi.it.

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

Milan, May 2025.

This privacy notice has been translated into english with the support of AI tools. The official and legally binding version is the italian text. In case of discrepancies, the italian version shall prevail.