

PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLE 13 OF EU REGULATION 679/2016 (GDPR)

Data Controller

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

Data Protection Officer (DPO)

Contact: privacy@polimi.it

Categories of Data Processed

- Identifying data (only for non-anonymous questionnaires);
- Responses to closed-ended questions (e.g., scale 1–5);
- Any voluntary textual comments.

Processing Methods

Personal data will be processed electronically and stored in databases accessible only to authorized personnel, in accordance with confidentiality, integrity, and security criteria. The collected data will be aggregated and anonymized to produce qualitative reports, solely for institutional purposes and continuous service improvement. Identifiable data will not be disclosed.

Nature and Purpose of Processing, Categories of Data Subjects

Participation in the questionnaires is voluntary but useful for improving the services offered. The processing aims to assess satisfaction levels and gather suggestions to enhance activities, services, or procedures. In some cases, the evaluation is required to fulfill contractual or quality obligations.

Table: Purpose and Categories of Data Subjects

Data Subjects	Questionnaire Type	Purpose	Anonymity
Regularly enrolled students	Enrollment, study plan, final exam	Improvement of student services	Non-anonymous
Support service users	Support tickets (e.g., maintenance, logistics, ICT, test procedures, TOL)	Quality assessment of support	Non-anonymous
External clients	Laboratory tests for quality	Quality verification for contractual and certification purposes	Non-anonymous

Staff or tax service users	Tax assistance	Evaluation of consultancy	Non-anonymous
End users of assets and services	QR on objects or services	Satisfaction analysis of physical assets	Anonymous
Online course participants	Post-course questionnaire (e.g., sustainability)	Course quality evaluation	Variable

Legal Basis for Processing

- Art. 6(1)(e) GDPR – Execution of a task carried out in the public interest: for questionnaires addressed to students, service users, courses, university assets.
- Art. 6(1)(b) GDPR – Execution of a contract: for evaluations required by external clients (e.g., laboratory services).
- Art. 6(1)(a) GDPR – Consent of the data subject: only for the optional collection of textual comments or dissemination of aggregated results.

Data Retention

Personal data will be retained for a maximum of 24 months from collection, unless extended for documentation, reporting, or audit purposes (especially for certified services).

Disclosure and Dissemination

Data will not be disseminated. Non-anonymous data may be processed by internal or external parties appointed as data processors. Aggregated and/or anonymized data may be used for statistical or internal reporting purposes.

Transfer of Data to Third Countries or International Organizations

The Controller does not transfer personal data collected through the questionnaires to countries outside the European Economic Area (EEA) or to international organizations. If such a transfer becomes necessary, it will be carried out in compliance with Articles 44 et seq. of the GDPR, adopting the appropriate safeguards provided by the regulation (e.g., adequacy decisions, standard contractual clauses).

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 is being processed;
- Access to your personal data and related information; rectification of inaccurate data or completion of incomplete data; erasure of personal data concerning you (where one of the conditions set out in Article 17(1) of the Regulation applies and subject to the exceptions provided in paragraph 3 of the same Article); restriction of processing (where one of the cases under Article 18(1) of the Regulation applies);



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anonymization or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which it was collected or subsequently processed.

You may lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it). Requests may be sent to the DPO of Politecnico di Milano at: privacy@polimi.it.

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.