



PRIVACY POLICY RELATED TO THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF EU REGULATION NO. 679/2016

This notice is issued pursuant to Article 13 of EU Regulation 2016/679 of 27 April 2016 concerning the protection of natural persons with regard to the processing of personal data and in compliance with the applicable legislation on personal data processing, as well as the free movement of such data.

Specifically, this notice refers to requests for simple or generalized civic access, or for review pursuant to Legislative Decree No. 33/2013, or for documentary access pursuant to Law No. 241/1990, regarding the use of personal data concerning the data subject.

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 (EU Regulation No. 679/2016, hereinafter "EU Regulation"), please note that your personal data will be used for the following purposes:

Purpose of Processing	Legal Basis	Categories of Personal Data	Retention Period
Purpose 1 Management of legal obligations related to requests for simple, generalized, or review civic access and documentary access, initiated pursuant to transparency regulations.	Legal obligation (Art. 6(1)(c) of the EU Regulation, specifically Law No. 241/1990, Legislative Decree No. 33/2013, and Director's Decree No. 7760 of 4.12.2017 "Regulation on administrative procedures, documentary, civic and generalized access at Politecnico di Milano") Public interest (Art. 6(1)(e) of the EU Regulation).	<ul style="list-style-type: none">• Personal identification data• Contact details• Identification data (ID, Tax Code)• Social role or representative authority• Access credentials for online form submission	Data will be stored for an unlimited period of time pursuant to the General Retention Plan for the documents produced by the Politecnico di Milano and for the fulfilment of the obligations of the Public Administration.

Nature of Data

Providing the data is mandatory to initiate the procedure described under Purpose 1.

Processing Methods

Data collection complies with the principles of relevance, completeness, and non-excessiveness in relation to the purposes for which the data are processed.



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Personal data are processed in accordance with the principles of lawfulness, fairness, and transparency under Article 5 of the EU Regulation, including through IT and telematic tools designed to store and manage the data, ensuring security and maximum confidentiality.

Data will be processed by authorized employees of Politecnico di Milano, in accordance with their roles as defined in the university's organizational chart.

Politecnico di Milano complies with current transparency regulations, including the publication of data and documents such as the Access Register, as recommended by ANAC Resolution No. 1309/2016, which includes a list of access requests received by the university, with subject, submission date, outcome, and decision date, subject to anonymization of any personal data.

Categories of Recipients

Data may be disclosed to any counter-interested parties and public and/or private entities legally entitled to receive them.

Disclosure of data may also occur, in accordance with the law, to Public Security Authorities, Judicial Authorities, or other public entities for purposes of defense, state security, and crime investigation, as well as to Judicial Authorities in compliance with legal obligations where criminal offenses are suspected.

Outside of these cases, personal data will not be disclosed or disseminated to third parties.

Transfer to Non-EU Countries or International Organizations

Personal data will be processed by the Controller within the territory of the European Union.

If technical and/or operational needs require the use of entities located outside the EU, or if data must be transferred to cloud-based systems and services outside the EU, processing will be governed by Chapter V of the EU Regulation and authorized based on specific EU decisions.

All necessary safeguards will be adopted to ensure full protection of personal data, with transfers based on:

- a) Adequacy decisions by the European Commission for the recipient third countries;
- b) Appropriate safeguards provided by the third-party recipient under Article 46 of the EU Regulation;
- c) Adoption of binding corporate rules (BCRs).

Data Subject Rights

Where applicable, the data subject may exercise the rights provided under EU Regulation No. 679/2016, specifically:

1. Right of access to personal data and related information (Art. 15 EU Regulation);
2. Right to rectification or anonymization of processed data;
3. Right to erasure (right to be forgotten), except for data contained in documents that must be retained by Politecnico di Milano for public interest reasons, or where a legitimate overriding reason for processing exists;
4. Right to restriction of processing (Art. 18 EU Regulation);
5. Right to object to the processing of personal data, subject to the necessity of processing for service provision;
6. Right to withdraw consent for non-mandatory data processing, without affecting the lawfulness of processing based on consent before withdrawal.

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

If the data subject believes their rights have been violated by the Controller and/or a third party, they may lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it) and/or another competent supervisory authority under the EU Regulation.

Milan, 15 October 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.