



INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF EU REGULATION NO. 679/2016 OF 27 APRIL 2016

This information notice is issued pursuant to Article 13 of EU Regulation No. 679 of 27 April 2016 (hereinafter “EU Regulation”) concerning the protection of natural persons with regard to the processing of personal data and in compliance with the legislation on the processing of personal data, as well as the free movement of such data.

Data Controller

The Data Controller of Politecnico di Milano is the 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, you are informed that your personal data will be used for the following purposes:

Purpose of Processing	Legal Basis	Categories of Personal Data	Retention Period
Purpose 1 Occupational health surveillance.	Legal obligation (Art. 6(1)(c) and Art. 9(2)(b) and (h) of the EU Regulation).	<ul style="list-style-type: none"> • Identification data • Personal data • Health data 	20 years from termination of employment for workers exposed to ionizing radiation; 10 years for all other workers.
Purpose 2 Compliance with health and safety obligations in the workplace.	Legal obligation (Art. 6(1)(c) and Art. 9(2)(b) and (h) of the EU Regulation).	<ul style="list-style-type: none"> • Identification data • Personal data • Health data 	20 years from termination of employment for workers exposed to ionizing radiation; 10 years for all other workers.
Purpose 3 Safety training activities in the workplace.	Legal obligation (Art. 6(1)(c) and Art. 9(2)(b) and (h) of the EU Regulation).	<ul style="list-style-type: none"> • Identification data • Personal data • Contact data 	For the entire duration of the employment relationship.

Occupational health surveillance consists of medical acts carried out by the appointed physician aimed at protecting the health and safety of workers in relation to the work environment, professional risk factors, and the nature of the work performed.

The appointed physician is supported by the Prevention and Protection Service and must meet the requirements set out in Legislative Decree 81/2008, as amended. The physician is appointed by the employer and performs:

- Preventive and periodic health surveillance of employees and equivalent non-staff personnel (e.g., PhD students, fellows, contractors, interns, students);
- Workplace inspections, risk assessments, and environmental measurements;



- Health surveillance for workers exposed to ionizing radiation by an authorized physician.

The purpose of data processing is occupational health surveillance, which includes issuing fitness-for-duty judgments, which must be communicated in writing to the employer and to the worker (Art. 41(6) of Legislative Decree 81/2008). Judgments may include:

- Fit;
- Partially fit, temporarily or permanently, with prescriptions or limitations;
- Temporarily unfit;
- Permanently unfit.

Anonymized data may also be used for educational, professional development, or research purposes.

Special Categories of Data

Health-related data (Art. 9(1) of the EU Regulation) are processed for the purposes listed in **TABLE 1**, to establish, manage, and terminate the employment relationship and to safeguard the life or physical integrity of the worker or third parties. These are processed in compliance with professional secrecy (Art. 9(3)) and the principles of lawfulness, fairness, transparency, adequacy, relevance, accuracy, minimization, and storage limitation (Art. 5).

Nature of Data Provision

Workers are required to undergo medical examinations if the risk assessment document (DVR) indicates exposure to risk factors requiring health surveillance. Employers are likewise obligated to ensure medical examinations and safety training (Arts. 18 and 20 of Legislative Decree 81/2008).

Processing Methods

Data may be processed on paper or digitally, manually and/or electronically, including via an internal FileMaker database used by Politecnico di Milano for managing medical visit deadlines. Data are also stored in paper archives and accessed only by authorized Prevention and Protection Service personnel.

Categories of Recipients

Data may be disclosed to public or private entities, in Italy or abroad, providing clinical or medical services on behalf of the Controller. These include:

- Coordinating Occupational Physician;
- Occupational Physicians;
- Authorized Physician;
- INAIL;
- ATS;
- Public or private training providers (e.g., Fire Brigade, Red Cross).

The Occupational and Authorized Physicians are independent data controllers (as per the Italian Data Protection Authority's opinion No. 7797 of 27.2.2019). Only they may access medical records and must implement appropriate security measures.

The employer may only know the final fitness judgment, not the underlying medical conditions.

Data Retention and Disposal

After the retention periods listed in **TABLE 1**, and once the statute of limitations for rights protection has expired, data will be deleted or anonymized.

Transfer to Non-EU Countries or International Organizations

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

If, for technical and/or operational reasons, it becomes necessary to use subjects located outside the European Union, or it becomes necessary to transfer some of the collected data to technical systems and



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services managed in the cloud and located outside the European Union area, the processing will be regulated in accordance with the provisions of Chapter V of the EU Regulation and authorized based on specific decisions of the European Union.

All necessary precautions will therefore be adopted to ensure the total protection of personal data, basing the transfer:

a) on adequacy decisions of the recipient third countries expressed by the European Commission; b) on adequate guarantees expressed by the third-party recipient pursuant to Art. 46 of the EU Regulation; c) on the adoption of binding corporate rules, so-called Corporate binding rules.

Rights of Data Subjects

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

- confirmation of the existence or otherwise of personal data concerning you;
- access to your personal data and information relating to them; rectification of inaccurate data or integration of incomplete data; deletion of personal data concerning you (upon the occurrence of 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); limitation of the processing of your personal data (upon the occurrence of one of the hypotheses indicated in Art. 18, paragraph 1 of the Regulation), transformation into anonymous form or blocking of data processed in violation of the law, including those for which retention is not necessary in relation to 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 pertinent to the purpose of the collection.

These rights can be exercised by contacting mail to: privacy@polimi.it.

If you believe that your rights have been violated by the Data Controller and/or by 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, August 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.