



**PRIVACY POLICY ON DATA PROCESSING UNDER ARTICLE 13 OF REGULATION EU  
679/2016 OF 27 APRIL 2016**

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

As part of its activities and pursuant to Article 3 of its Statute, Politecnico di Milano aims to promote well-being in study and work environments and adopts prevention strategies to enhance their safety and quality. Promoting "well-being in study and work environments" implies the adoption of measures aimed not only at physical safety but also at the psychological well-being and general health of those who frequent these environments. Prevention strategies may also include initiatives to protect physical health (such as disease or injury prevention) and mental health (such as stress reduction and psychological support), thus making the study and work environment safer and qualitatively better from a health perspective.

In particular, this privacy policy refers to the execution of administrative procedures related to the services provided by the PoliPsi Service of Politecnico di Milano.

**Data Controller**

Politecnico di Milano - General Director by delegation of the Rector pro tempore – Contact: [dirgen@polimi.it](mailto:dirgen@polimi.it).

**Internal Data Processing Manager**

Dr. Chiara Bianca Pesenti, Head of the Campus Life Area, email: [chiara.pesenti@polimi.it](mailto:chiara.pesenti@polimi.it).  
Data will be processed by other authorized and trained individuals in compliance with applicable regulations.

**Data Protection Officer and Contact Points**

Email: [privacy@polimi.it](mailto:privacy@polimi.it).

**Purpose of processing, legal basis, categories of data, and retention period**

For the purposes of applying european and national legislation in this field, personal data will be used for the following purposes:

<b>Purpose of data Processing</b>	<b>Legal basis</b>	<b>Categories of personal data processed</b>	<b>Retention period</b>
<b>Purpose 1</b> Execution of administrative procedures for access to PoliPsi Service.	Consent (Article 6(1)(a) of the EU Regulation).	<ul style="list-style-type: none"> <li>• Personal data</li> <li>• Identification data</li> <li>• Contact data</li> <li>• Enrollment data</li> </ul>	Data will be retained for the duration of the individual's stay at the university and thereafter for the period in which Politecnico di Milano is subject to retention obligations for other purposes provided by law or regulation.



<p><b>Purpose 2</b> Compilation of statistical reports and periodic monitoring of access to PoliPsi services.</p>	<p>Public interest (Article 6(1)(e) of the EU Regulation).</p>	<ul style="list-style-type: none"> <li>• Personal data</li> <li>• Identification data</li> <li>• Contact data</li> <li>• Enrollment data</li> </ul>	<p>Data will be retained indefinitely due to transparency obligations and proper functioning of public administration.</p>
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It is further specified that Data Controller will process information that may infer distress conditions, potentially identifying psychological and psychotherapeutic support. Such information will be considered "special data" pursuant to and for the purposes of Article 9 of the EU Regulation and, as such, processed with all the precautions and guarantees provided by law for this category of personal data. Such data will be provided exclusively on a voluntary basis by the data subject and processed by duly authorized personnel upon the explicit and express consent of the data subject. Under no circumstances will personal data relating to diagnoses and/or evaluations of psychological and psychotherapeutic support, handled exclusively by the Psychologist and/or Psychotherapist, be processed. These professionals operate as autonomous Data Controllers.

**Nature of Data Provision**

Providing the requested data for Purpose 1, which requires the data subject's consent, is voluntary and optional. If data is not provided, administrative procedures for accessing PoliPsi services cannot be carried out.

**Processing Methods**

Processing for the indicated purposes may be carried out using both paper and digital media, manually and/or with electronic or automated tools. Data is also stored in paper archives for the duration of the processing and in digital format indefinitely due to transparency obligations and proper functioning of public administration. Access to acquired data for these purposes is allowed only to duly authorized personnel.

**Categories of Recipients**

In relation to the above purposes, in addition to university employees and collaborators acting based on specific instructions, personal data may also be disclosed to other public administrations, including anonymously, if they must process the same data for institutional procedures. Data may also be shared with public entities to whom disclosure is mandatory under European, national laws, or regulations, as well as insurance entities for accident claims.

Additionally, data may be transferred to third parties, such as Psychologists and/or Psychotherapists, who will process the data as independent Data Controllers.

**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 entities located outside the EU or to transfer some collected data to technical systems and cloud services managed outside the EU, processing will be conducted in compliance with Chapter V of the EU Regulation and authorized based on specific decisions by the European Union. All necessary precautions will be adopted to ensure the full protection of personal data, with the transfer based on:



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- a) Adequacy decisions by the European Commission regarding the recipient third countries;
- b) Adequate guarantees expressed by the third-party recipient under Article 46 of the EU Regulation;
- c) Adoption of binding corporate rules (Corporate Binding Rules).

### **Rights of the Data Subjects**

The data subject may, at any time, request the Data Controller to exercise the following rights, pursuant to Articles 15 to 22 of the EU Regulation:

- Obtain confirmation as to whether personal data concerning them is being processed and, if so, access their data, as well as receive all available information regarding their source if the data was not collected from them.
- Request the rectification, deletion, or restriction of processing of their data.
- Object to the processing of their data, without prejudice to the Data Controller's right to evaluate their request.
- Withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- Obtain data portability, where applicable under the law.

These rights can be exercised by contacting [privacy@polimi.it](mailto:privacy@polimi.it). If the data subject believes their rights have been violated by the Data Controller and/or a third party, they have the right to file a complaint with the Data Protection Authority and/or another competent supervisory authority under the EU Regulation.

Milan, February 2025.

*This privacy policy 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.*