



POLITECNICO
MILANO 1863

PRIVACY POLICY FOR THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLE 13 OF REGULATION (EU) 679/2016 OF 27 APRIL 2016

This privacy policy is issued pursuant to Art. 13 of Regulation (EU) 679/2016 of 27 April 2016 (hereinafter “the Regulation”) relating to the protection of natural persons with regard to the processing of personal data and compliance with the legislation on the processing of personal data, as well as the free movement of such data.

In particular, this privacy policy relates to those persons deemed to be participants in scientific research projects undertaken by the Politecnico di Milano.

Data Controller

The Data Controller is the Politecnico di Milano, in the person of the Director General delegated by the pro-tempore Rector. Contact details: dirgen@polimi.it

The Politecnico di Milano is the data controller for the personal data and the information that it collects and processes as described in this Privacy Policy. This means that it is responsible for safeguarding the information and ensuring that it is processed in compliance with the provisions regarding the protection of personal data and, in particular, those contained in the Regulation and Italian Legislative Decree No. 196/2003 “Italian Personal Data Protection Code”, as amended and integrated by Italian Legislative Decree No. 101 of 10.08.2018.

In particular, the Politecnico di Milano shall undertake to implement measures to ensure that the data processed are accurate and updated; to provide clear information on the processing of data; to process the data for specific purposes only; to only share the data with the third parties explicitly stipulated and to implement sufficient technical and security measures during the processing activities.

In addition to this Privacy Policy, the Data Controller shall also provide the participant with an informative document on taking part in the research (“Informed Consent”) which sets out the details of the study and the research activities foreseen.

Data Protection Officer and contact details

E-mail: privacy@polimi.it - Tel.: 02 23999378.

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

Research is an activity that has the purpose of developing a body of knowledge and/or new theories and material.

The parties at the Politecnico di Milano that perform research activities may be undergraduate or postgraduate students (working under the supervision of appropriate staff), staff employed by the Politecnico di Milano in various capacities and roles (teaching staff or technical and administrative staff) or a combination of staff and students.

Research may also be conducted solely by researchers from the Politecnico di Milano or it may involve researchers from other organisations and/or universities that are explicitly identified.

Current legislation regarding the protection of personal data establishes that data processing is only permitted if the processing satisfies one of the conditions provided for in articles 6 and 9 of the Regulation.



In general, where personal data is processed as part of a scientific research project, the following conditions apply:

1. **Article 6, paragraph 1, letter e) of the Regulation**, that is data processing for the performance of a task carried out in the public interest. In this case, research is an institutional activity that the Politecnico di Milano carries out in the public interest as part of its principal function as a university, in accordance with Italian Law and its Statute;
2. **Article 9, paragraph 2, letter j) of the Regulation**, that is the processing of special categories of personal data for scientific research purposes or statistical purposes.

Consent is not generally the legal basis for the use of personal information for the purposes of research. The participant's consent is required exclusively for registration and active participation in the research project and it may be withdrawn at any time.

Consent for participation in the study shall therefore not be deemed to be the legal basis for the continued use of personal data during the research project and in the results of the same.

The participant's explicit consent may also be required for specific uses of personal data, namely in the following cases:

- to access information contained in medical files;
- to use personal data in research results in an identifiable manner; For example, explicit consent will be required in order to include the project participant's photo or name in any research report or other outcome and for the inclusion of any film recording made as part of the research. It is possible to withdraw this consent at any time before publication or transmission. Any refusal or withdrawal of this consent will not prejudice the ongoing legal basis for the use of the information for the research itself, which is covered by other conditions of the legislation concerning the protection of personal data as described above.

Data processing methods

The data are processed solely for the purposes of the specific research project and for the corresponding monitoring and reporting activities, which are carried out by duly authorised persons who are responsible for such activities. It is possible that Politecnico di Milano personnel or other persons responsible for the monitoring and/or reporting of the study may have access for the purposes of ensuring that the research is carried out in compliance with the legislation in effect. Wherever the research entails the anonymisation of personal data and those forming part of a set of statistical research data, these may be saved in the research archive and used (in anonymous form) for future research.

In addition to the data processed as part of the research activity, personal data in the research project's governance documentation (in particular, agreements with the participants or consent forms) and records of any communication via e-mail or post will also be processed. These will also be retained for the purposes of reporting even if the data subject decides not to participate or to withdraw from the project at a later date.

Retention of data

The informative document on taking part in the research ("Informed Consent") will include information on the length of the project and the requirement to retain the data in an identifiable form for the entire duration.



It will also inform of any intention to retain the identifiable data for a longer period, for example where there may be the intention to link this research to the results of another project or to study changes to factors or results over time.

In determining the retention periods, the researchers from the Politecnico di Milano will take into account any requirement to retain the data in an identifiable format in order to allow them to verify the results of the research, for example when their research is assessed or examined. They must also take into account any requirement to render the data available for reporting.

Researchers from the Politecnico di Milano could implement retention periods such that the data is not retained in an identifiable form when it is no longer necessary for the research itself or the corresponding purposes such as reporting.

Transfer of data

It is possible that third parties may access the personal data in an identifiable form solely for the purposes of the research project. This will also be explained in the informative document on taking part in the research (“Informed Consent”).

Transfer of data to third parties may occur in the event that the research is conducted in collaboration with other organisations (for example other universities or external partners of the Politecnico di Milano) if it is necessary to use an external service or if the work is monitored and verified by another organisation that provides funding for the research or a collaborating organisation with its own audit requirements.

In these cases, agreements will be stipulated in order to ensure that the other organisation keeps the data secure and processes the data exclusively for the specific purpose relating to the research project.

Rights of data subjects

In accordance with current legislation regarding the protection of personal data, in your capacity as a data subject, you may exercise the following rights before the Data Controller:

- the right to request access to personal data concerning you being processed by the Politecnico di Milano and information concerning the processing carried out;
- the right to rectification of any inaccurate personal data concerning you;
- the right to request erasure of personal data concerning you from systems and files;
- the right to restrict the processing of personal data concerning you;
- the right to object to the processing of personal data concerning you;
- the right to portability of the personal data concerning you.

Some of these rights may be subject to certain exceptions or exemptions.

In particular, there are limits to the right to restrict the processing or to erase the data where this would have a negative impact on the integrity and value of the scientific research.

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

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