

PRIVACY POLICY FOR DATA PROCESSING

PURSUANT TO ART. 13 OF EU REGULATION NO. 679/2016 OF APRIL 27, 2016

We know how important is your privacy, especially in careful situations. For this reason, we want to explain you, in a simple and clear way, how Guarantee Act Committee (CUG) of Politecnico di Milano processes your personal data.

Who we are and what we do?

CUG is committed to promoting equal opportunities, preventing discrimination, and improving the well-being of those who works and studies at Politecnico di Milano. Our mission is to create an inclusive, peaceful and respectful environment for everyone.

Politecnico di Milano is the Data Controller.

Data Protection Officer (DPO) can be contacted at privacy@polimi.it.

Why do we process your personal data?

We process your personal data in compliance with the provisions of EU Regulation no. 679/2016 (or GDPR) and for the following purposes:

- promoting equal opportunities and well-being, combating all forms of discrimination, monitoring situations of discomfort, and proposing targeted interventions;
- compiling statistics and studies: we analyze data in aggregate form to continuously improve well-being policies.

The legal basis that makes the processing of your personal data lawful is the legal obligation (art. 6, par. 1, lett. c) of the GDPR) and the relevant public interest, in case of special data (art. 9, par. 2, lett. j) of the GDPR and art. 2 sexies, comma 2, lett. dd) of Legislative Decree no. 196/2003 and subsequent amendments).

This processing also finds conditions of lawfulness in the following national and university provisions: Law no. 183/2010; Law no. 124/2015; Directive of the President of the Council of Ministers of June 1, 2017, no. 3; Directive of March 4, 2011, of the Public Function Department and Equal Opportunities Department; Directive 2 of June 26, 2019, of the Minister of Public Administration; Statute of Politecnico di Milano; Regulation of operation of the CUG of Politecnico di Milano.

Which data do we process?

To achieve our goals, we may process:

- common data, such as name, surname, contact details, tax code, and information about your academic or work career.
- special data, only when necessary, such as information related to health, sexual orientation, political opinions, or other particular situations.

We are committed to processing only the data strictly necessary for our work.

How do we process and protect your data?

Your personal data is managed securely:

- we use electronic systems and paper documents protected by adequate security measures;
- only authorized people, committed to maintaining the utmost confidentiality, can access your data;
- your data will never be used for purposes other than those indicated.

With whom do we share your data?

The Guarantee Act Committee (CUG) undertakes not to share the collected data with external subjects without prior communication to the interested party, except in cases provided for by current legislation. With prior communication, your personal data may be shared exclusively with:

- Offices and people within Politecnico di Milano, for purposes strictly related to the institutional tasks and activities of the CUG and ensuring maximum confidentiality.
- Subjects collaborating with Politecnico di Milano, such as, for example, the Trusted Advisor or the staff of the Workplace Discomfort Listening Desk, exclusively to ensure the provision of services or the pursuit of the Committee's purposes.

Transfer of data to non-EU countries or international organizations

As a rule, your data is processed within the European Union. If for technical or operational reasons it is necessary to transfer them to non-EU countries, we will ensure that:

- the countries are considered safe by the European Commission;
- additional security measures are adopted, such as standard contracts approved by EU regulations (art. 46 of the EU Regulation).

In any case, you will always be informed and protected.

How long do we keep your data?

The data will be kept only for the time necessary to carry out the planned activities and to comply with legal obligations. At the end, they will be deleted or anonymized.

Your rights

As an interested party, you have the right to:

- Access your data: you can know what information we have about you and why.
- Correct your data: if something is not correct, you can ask to update it.
- Request deletion: if we no longer need your data or there are no legal bases for processing them, you can ask us to delete them.
- Limit processing: in some cases, you can request that your data be used only in certain situations.
- Object to processing: for example, if you do not want your data to be used for non-essential communications, you can report your objection to this processing.
- Transfer your data: you can request a copy of your data in a readable format to transfer them elsewhere.

To exercise your rights, write to privacy@polimi.it. We will respond as soon as possible, and in any case within the legal deadlines.

If you believe that your rights have been violated, you can file a complaint with the Data Protection Authority (www.garanteprivacy.it).

Milan, April 2025.