



**Politecnico  
di Torino**

## **PolITO Staff Privacy Policy (Art. 13 of the Regulation EU 2016/679)**

This privacy policy applies to the processing of personal data of faculty members, researchers, technical and administrative staff members.

We provide you the following information on the processing of your personal data in accordance with the General Data Protection Regulation (EU Regulation 679/2016).

### **CONTACTS**

The **Data Controller** is Politecnico di Torino, represented by the Rector *pro tempore* as legal representative, with statutory seat in Corso Duca degli Abruzzi, n. 24, 10129 – Turin.

You can contact the Data Controller at: [politecnicoditorino@pec.polito.it](mailto:politecnicoditorino@pec.polito.it) (certified e-mail)

For further information and inquiries write to: [privacy@polito.it](mailto:privacy@polito.it)

You can contact the **Data Protection Officer** (DPO) of Politecnico di Torino for inquiries on the processing of your personal data and your rights at: [dpo@polito.it](mailto:dpo@polito.it); [dpo@pec.polito.it](mailto:dpo@pec.polito.it) (certified e-mail).

### **PRICIPLES, LEGAL BASIS AND PURPOSES OF THE PROCESSING OF PERSONAL DATA**

Politecnico di Torino (Data Controller) will process your personal data in accordance with the principles of data minimization, accuracy, storage limitation, integrity, confidentiality and accountability (article 5, paragraph 1 of the GDPR).

Politecnico di Torino will process the personal data (including special categories of personal data) you provided when you were hired, during your employment relationship or upon termination of your contract. Your personal data and your family members' data will be processed for the purposes of:



Descrizione	Legal basis
<ul style="list-style-type: none"> <li>- fulfilling the legal requirements relating to the employment relationship, including those related to the management of tax, social security and salary charges, occupational medicine and the assessment of the employee's working capacity as well as relating to transparency and anti-corruption;</li> <li>- management of the welfare system;</li> <li>- management of personnel training and development processes;</li> <li>- recruitment and execution of bankruptcy procedures;</li> <li>- management of trade union relations;</li> <li>- management of the performance system;</li> <li>- management of the remote employment relationship (so-called 'smart working / teleworking'), also for the purpose of enabling cooperation, supervision, and communication among the Data Subjects and between the Data Subject and their hierarchical superiors.</li> </ul>	<ul style="list-style-type: none"> <li>- <b>art. 6, paragraph 1, let.:</b> <ul style="list-style-type: none"> <li>o <b>c)</b> ["processing is necessary for compliance with a legal obligation to which the controller is subject"] of the GDPR;</li> </ul> </li> <li>- <b>art. 9, paragraph 2, let.:</b> <ul style="list-style-type: none"> <li>o <b>b)</b> ["processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment ... in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law"] of the GDPR;</li> <li>o <b>h)</b> ["processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, ... on the basis of Union or Member State law"] of the GDPR;</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>- disciplinary procedures;</li> <li>- historical research, statistics and archival conservation;</li> </ul>	<ul style="list-style-type: none"> <li>- <b>art. 6, paragraph 1, let.:</b> <ul style="list-style-type: none"> <li>o <b>e)</b> ["processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority"] of the GDPR;</li> </ul> </li> </ul>



	vested in the controller"] of the GDPR;
- managing judicial and extrajudicial disputes;	- <b>art. 6, paragraph 1, let.:</b> <ul style="list-style-type: none"> <li>o <b>c)</b> ["see above"] of the GDPR;</li> <li>o <b>e)</b> ["see above"] of the GDPR;</li> </ul>
- communicating institutional events, in order to pursue the purposes set out in the Statute and relating to the activities / initiatives managed by the University which may contain data, images and videos depicting the data subject (for example conferences, conventions, training events, interviews, etc.);	- <b>art. 6, paragraph 1, let.:</b> <ul style="list-style-type: none"> <li>o <b>e)</b> ["see above"] of the GDPR;</li> </ul>
- obligations related to the activation/administrative management of the insurance policy "Healthcare for reimbursement of medical expenses" and possible extension to the family unit	- <b>art. 6, paragraph 1, let.:</b> <ul style="list-style-type: none"> <li>o <b>b)</b> ["processing is necessary for the performance of a contract to which the data subject is party (...)]" of the GDPR;</li> </ul>

In particular, Politecnico di Torino will collect and process the above-mentioned data manually, in electronic and paper format, and will enter them in paper or electronic archives.

## PERSONS AUTHORISED TO PROCESS THE PERSONAL DATA, POSSIBLE RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA AND DATA PROCESSOR

The personal data which are processed for the above-mentioned purposes can be disclosed, or are in any case accessible to the employees and



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collaborators of specific PoliTo offices who will be adequately instructed by the Data Controller.

Politecnico di Torino can disclose personal data to other public authorities when they need to process these data in order to carry out procedures for which they are the responsible institutions. On specific grounds, Politecnico di Torino can also disclose personal data to other public/private entities to whom, in the presence of the relevant conditions, the communication is compulsorily required by EU provisions, laws or regulations or is necessary for the provision of specific Services (e.g. Welfare, Health Policy). Politecnico di Torino can disclose personal data also for the fulfillment of contractual obligations of which the Data Controller is a party (e.g. Financial reporting of European projects, etc.). Personal data are stored in the university servers (located inside Politecnico) and/or in external servers which belong to providers of technical and administrative services. These service providers may have access to your personal data exclusively for the services they render. In this case, Politecnico engages them as Data Processors in accordance with art. 28 of the GDPR.

## TRANSFER OF PERSONAL DATA

Your personal data will not be transferred to non-EU countries (*Third Countries*). The personal data may be transferred to non-EU countries pursuant to art. 49 of the GDPR for “*staff mobility*” projects only after obtaining the explicit consent of the data subject.

## PERIOD FOR WHICH PERSONAL DATA ARE STORED

Your personal data and the data relating to your professional career at PoliTo are kept for an unlimited period of time in accordance with the achieving obligations imposed by the law.

With regard to possible disciplinary measures imposed on you while you are employed at PoliTo, information on the final disciplinary sanction is kept for an unlimited period of time or for 5 years if the final disciplinary sanction is later revoked or cancelled.



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Other data collected for the use of PoliTo services are kept for no longer than is necessary for the purposes for which the personal data are processed (art. 5 - GDPR).

## PROVIDING PERSONAL DATA

You are required to provide your personal data to Politecnico di Torino. If you refuse to provide your personal data, Politecnico cannot pursue the above-mentioned aims.

## RIGHTS OF THE DATA SUBJECT

You are the Data Subject and you have the right to obtain from the Data Controller (in accordance with articles 15 et seq. of the GDPR):

- access to your personal data and to the information referred to in art. 15 of the GDPR;
- rectification of inaccurate personal data (including the right to have incomplete personal data completed);
- erasure of your personal data (except for data which must be kept by Politecnico di Torino) unless there are overriding legitimate grounds for the processing;
- restriction of processing pursuant to art. 18 of the GDPR.

You also have the right to:

- object to the processing of your personal data, except when the processing is required for your use of services;
- withdraw your consent given for non-compulsory processing of personal data, without affecting the lawfulness of processing based on consent before its withdrawal.

Please contact the Data Controller if you want to exercise your rights.

## COMPLAINT

You have the right to contact the Italian Data Protection Authority (Garante per la protezione dei dati personali) following the instructions available at: <https://www.garanteprivacy.it/home/docweb/-/docweb-display/docweb/4535524>



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This privacy statement has been updated on 03/2025