



Specific Information on the Processing of Personal Data for the purposes of Communication of the Educational Offer

The **CONSORZIO POLIEDRA - Centro di servizio e consulenza del Politecnico di Milano su pianificazione ambientale e territoriale**, with registered office in Milan, Piazza L. Da Vinci 32 20133 and operational office in Milan, Via Giuseppe Colombo 40, 20133, CF - VAT 12903700156, is the data controller ("POLIEDRA" or "Controller").

1. Data Controller

The Data Controller is **Consorzio POLIEDRA - Centro di servizio e consulenza del Politecnico di Milano su pianificazione ambientale e territoriale**, piazza Leonardo da Vinci, 32, 20133 Milan, and operational office in Milan, via Giuseppe Colombo, 40, 20133 Milan.

The Data Controller releases the information notice to indicate in a transparent and easily accessible way the categories of Data Subjects, the type of data and processing performed, the purposes of the processing, the security measures adopted, and the subjects to whom the data may be communicated.

The Controller, pursuant to art. 37 of EU Regulation no. 2016/679, has appointed a Data Protection Officer ("DPO"), available at the email address dpo-poliedra@polimi.it.

For any communication other than that for which the DPO is appointed, the Controller provides the email address privacy-poliedra@polimi.it.

2. Purpose of Data Processing and Legal Basis

2.1 Purpose: Personal data provided or collected from publicly accessible sources will be processed to send communications relating to the courses offered by Poliedra, including information on new initiatives, training courses, events and promotions, conferences via email, phone calls, or text messages.

2.2 Legal Basis: The processing of data will be carried out based on the following legal grounds:

- **Consent** (Article 6, Paragraph 1, Letter a of the GDPR): For email addresses provided directly by the data subjects, processing will take place only with explicit consent.
- **Legitimate interest** (Article 6, Paragraph 1, Letter f of the GDPR): The processing of personal data related to corporate or institutional email addresses, published on official or company websites, as well as generic addresses of public entities and private organizations (e.g., "info@", "segreteria@"), will be based on POLIEDRA's legitimate interest in promoting its training activities. This interest is based on the need to disseminate the training offer to subjects potentially interested within the scope of their professional or institutional activities.

POLIEDRA ensures, in any case, the right to object at any time through simple and accessible means, as indicated in the communications sent.

2.3 Nature of Data Provision and Consequences of Refusal: Providing the data is optional. However, failure to provide it will make it impossible to receive information about our courses and promotional initiatives.

2.4 Right to Object and Immediate Opt-Out: Data subjects may object to the processing of their personal data at any time. Each communication will include a link for immediate unsubscribe (opt-out).

2.5 Withdrawal of Consent: Data subjects can withdraw their consent to the processing of their personal data for communication and promotion purposes at any time by contacting POLIEDRA at the provided email address.

3. Communication and Dissemination of Data



The personal data collected through forms on the institutional website of POLIEDRA and/or other affiliated sites of POLIEDRA, as well as through paper forms, are processed exclusively for the purposes described in this notice. These data will not be disseminated and may be shared only with third parties that collaborate with Poliedra under specific contractual agreements, in compliance with the processing purposes specified here.

4. Processing Methods

The personal data provided to POLIEDRA will be processed digitally and entered into our secure databases. Only personnel authorized by POLIEDRA will have access to the data to manage operations such as consultation and processing, ensuring confidentiality and data protection in accordance with current regulations. Additionally, for specific services such as mass mailing or broadcast communications (e.g., WhatsApp), we may use external providers that operate under security and confidentiality standards equivalent to those of POLIEDRA.

5. Data Retention Period

POLIEDRA will retain the personal data of the data subjects for a maximum period of 5 years to provide information on training courses, events, and new initiatives. This period has been established based on the interest shown in the subject and the opportunities for university education. At the end of this period, to continue using the data for the same purposes, POLIEDRA will request new explicit consent from the data subjects. In the absence of renewed consent, the data will be deleted or anonymized in accordance with data protection laws.

6. Rights of the Data Subject

The data subject has the rights set out in art. 15 of EU Regulation no. 2016/679, specifically the following rights:

- Obtain confirmation of the existence of their personal data at the Controller, even if not yet recorded;
- Obtain information on: a) the origin of personal data; b) the purposes and methods of processing; c) the logic applied in case of processing carried out with the aid of electronic instruments; d) the identification details of the Controller, processors, and other persons in charge;
- Obtain: a) the updating, rectification, or, when interested, integration of data; b) the cancellation, transformation into anonymous form, or blocking of data processed unlawfully, including data that do not need to be kept for the purposes for which they were collected; c) certification that the operations referred to in points a) and b) have been brought to the attention, including their content, of those to whom the data have been communicated or disseminated, except where this proves impossible or involves a disproportionate effort;
- Oppose, in whole or in part: a) for legitimate reasons, the processing of their personal data, even if pertinent to the purpose of collection; b) the processing of their personal data for the purpose of sending advertising material or direct sales or for carrying out market research or commercial communication through the use of traditional marketing systems, or automated call systems without operator, email, telephone, and/or paper mail.

The data subject also has the rights set out in articles 16-21 of EU Regulation no. 2016/679, namely the right to rectification, the right to be forgotten, the right to restriction of processing, the right to data portability, and the right to lodge a complaint with the Data Protection Authority.

The data subject may exercise their rights at any time by sending a request to the Controller at the following email address privacy-poliedra@polimi.it or dpo-poliedra@polimi.it.

7. Changes to the Information

The Controller reserves the right to modify, update, add, or remove parts of this notice at its discretion and at any time. To facilitate this verification, the notice will contain the date of the update.