

## **Poliedra disclosure agreement for Clients' / Suppliers' personal data processing**

The **CONSORTIUM POLIEDRA - Service and consultancy center of the Politecnico di Milano** with registered office in Milan, Piazza L. Da Vinci 32 20133 and operational headquarters in Milan, Via Giuseppe Colombo 40, 20133 CF- P.IVA 12903700156- is the data controller of personal data ("POLIEDRA", or "Owner").

### **1. Data Controller and Data Processors**

POLIEDRA, via G. Colombo n.40, ZIP code 20133 - Milano, VAT 12903700156, e-mail address [privacy-poliedra@polimi.it](mailto:privacy-poliedra@polimi.it) is the Data Controller and issues information to indicate, in a transparent and easily accessible way, the categories of interested parties, the type of the data and the treatments carried out, the purposes underlying the processing, the security measures adopted and the subjects to whom the data may be communicated.

POLIEDRA, pursuant to art. 13 of the EU Regulation no. 2016/679, will proceed to the processing of the data of the interested parties to the extent that such processing is necessary for the purposes of managing relations with Clients and Suppliers.

The “processing of personal data” means any operation or set of operations, carried out with or without the aid of automated processes and applied to personal data, even if not registered in a database, such as collection, registration, organization, the structuring, the conservation, the elaboration, the selection, the blocking, the adaptation or the modification, the extraction, the consultation, the use, the communication, the diffusion or any other form of making available, the comparison or interconnection, limitation, deletion or destruction.

The data will be processed for the purposes referred to in paragraph 2 below, manually and / or through the support of IT or telematic means.

In addition to the above POLIEDRA, pursuant to art. 37 of EU Regulation no. 2016/679 has appointed a Data Protection Officer (DPO), available at mail address [dpo-poliedra@polimi.it](mailto:dpo-poliedra@polimi.it).

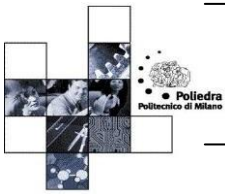
For any communication other than that for which the DPO is designated, POLIEDRA provides the e-mail address [privacy-poliedra@polimi.it](mailto:privacy-poliedra@polimi.it)

### **2. Purpose of data processing**

The purposes for which data are collected are below listed:

- a. Pursuit of instrumental and / or complementary purposes to the activities functional to the performance of the existing contractual / pre-contractual relationship;
- b. Keeping the general accounting, invoicing, credit management, civil and tax obligations required by law and for updating the archives;
- c. Detection of the degree of satisfaction of the interested party on the quality of the product and services rendered by POLIEDRA, including statistical analysis.

The data is processed for the purpose of sending service communications, management of requests clarification, reports and complaints management in relation to the contractual relationship established, as



well as for its fulfillment.

The collection of personal data is mandatory, as it is necessary to comply with legal obligations. If the Client/Supplier does not intend to consent to the transfer of personal data, POLIEDRA will not process the transmitted data by eliminating them and not establishing the contractual relationship.

Any personal data related to the Client/Supplier or collected from him/her, subject to the provision of consent, may be used for marketing purposes (i.e., for the promotion of advertising and commercial events, the sending of advertising campaigns, promotions and offers), which can be carried out by POLIEDRA both with automated methods and through traditional methods.

### **3. Data communication and dissemination**

Personal data may be disclosed to third parties known to POLIEDRA only and exclusively for the aforementioned purposes and, in particular, to the following categories of subjects:

1. External companies that perform services on our behalf;
2. Bodies and Public Administrations for legal obligations;
3. Professionals who can be of support in compliance with the law.

These subjects will process personal data as external managers or autonomous owners according to the requirements of the law.

### **4. Category of collected data**

POLIEDRA processes only the personal data provided by the Customer/Supplier and strictly necessary for the performance of contractual relationships with them.

### **5. Processing methods**

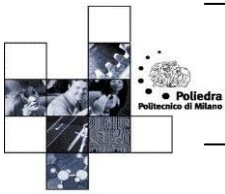
Personal data are processed with automated and manual tools for the time strictly necessary to achieve the purposes for which they were collected. If necessary, POLIEDRA will formally request an extension from the Customer/Supplier. Specific security measures in accordance with art. 32 of the GDPR 2016/679 are observed to prevent data loss, illicit or incorrect use and unauthorized access, as required by law. Finally, the processing of personal data is handled, in compliance with the provisions of art. 29 GDPR, only by the personnel in charge of processing by the Data Controller or Managers.

The treatment will be carried out in the following ways: paper supports, magnetic supports, manually and / or with electronic or, in any case, automated tools. Personal data will be stored both in a physical archive within POLIEDRA and in the company server, to follow up the purposes and activities indicated in this information.

Personal data will be processed solely for the purposes referred to in paragraph 2 above; if POLIEDRA intends to use the same data for further purposes, it must do so with the explicit consent of the interested party.

### **6. Data retention time**

Pursuant to art. 5 of EU Regulation 679/2016, "Principles applicable to the processing of personal data", personal data are stored in a form that allows the identification of data subjects for a period of time not exceeding the achievement of the purposes for which they are processed.



The personal data of the interested parties may also be kept for longer periods in compliance with the obligations relating to the legal regulations in force (by way of example in the field of accounting or due to litigation situations).

## 7. Transfer of personal data

POLIEDRA will not transfer Clients' / Suppliers' data to Third Countries not belonging to the EU. or in Member States of the European Union.

## 8. Special categories of personal data

POLIEDRA does not collect particular categories of data (articles 9 and 10 GDPR).

## 9. Existence of an automated decision-making process, including profiling

POLIEDRA does not adopt any automated decision-making process, including profiling, as per articles 22, paragraphs 1 and 4, of EU Regulation no. 679/2016.

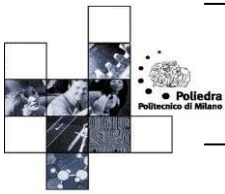
## 10. Clients'/Suppliers' rights

The Client/Supplier has the rights referred to in Articles. 15 to 22 of EU Regulation no. 2016/679, with specific reference to the below mentioned rights precisely the following rights of:

- obtain confirmation of the existence / non existence from POLIEDRA of their personal data, even if not yet registered;
- obtain information about the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data have been or will be communicated and, when possible, the retention period;
- obtain the correction and deletion of data;
- obtain the limitations of the treatment;
- obtain data portability, i.e. receive them from a data controller, in a structured format, commonly used and readable by an automatic device, and transmit them to another data controller without hindrance;
- oppose the processing at any time and also in the case of processing for direct marketing purposes;
- oppose an automated decision-making process relating to natural persons, including profiling;
- ask the data controller to access personal data and to correct or cancel them or limit their processing or to oppose their processing, in addition to the right to data portability;
- withdraw the consent at any time without prejudice to the lawfulness of the processing based on the consent given before the revocation;
- propose a complaint to a supervisory authority.

The Client/Supplier may, at any time, exercise their rights by sending a request to POLIEDRA via:

- registered letter with return receipt to POLIEDRA, at the operational headquarters in Milan, Via G. Colombo 40, 20133 Milan
- e-mail to the address [privacy-poliedra@polimi.it](mailto:privacy-poliedra@polimi.it)



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**POLIEDRA**  
Centro di servizio e consulenza  
del Politecnico di Milano  
su pianificazione ambientale e territoriale

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or Client/Supplier can choose to assert their rights before the Personal Data Protection Authority.

## **11. Amendment to disclosure agreement**

POLIEDRA reserves the right to modify, update, add or remove parts of this information at its discretion and at any time. In order to facilitate this verification, the information will contain an indication of the update date.