



With this document, POLI.design informs you about how it processes your personal data in connection with a free training programme aimed at its students and alumni. You are not required to do anything: if you do not wish to receive communications on this matter, it is enough to let us know using the methods indicated in point 7.

1. Who processes your data

Data Controller	POLI.design Srl — Società consortile a responsabilità limitata Via Don Giovanni Verità n. 25, 20158 Milano Tax code and VAT No. 12878090153
Contacts	Certified email (PEC): polidesign.operations@pec.it Email for exercising your rights: privacy@polidesign.net
Data Protection Officer (DPO)	Consulenti Privacy Srl — Dott. Paolo Rosetti Email: dpo@polidesign.net

2. What data we process and where it comes from

We process the following data concerning you:

- a) first and last name, email address, the Master's programme attended and year of completion. This data comes from POLI.design's records. The email address is either the one you provided when enrolling in the Master's programme or the mailbox that POLI.design assigned to you as part of your studies and which it administers;
- b) information about your current professional position. This data was partly obtained from our records and partly updated by consulting professional profiles that you yourself made public on online professional networks.

Regarding point b), we want to be transparent. Those profiles were consulted before you received this notice. We inform you that we will not carry out any further consultations and that, if you wish, you can ask us to delete that data using the methods indicated in point 7.

We do not process special categories of data under Article 9 of the Regulation, nor data relating to criminal convictions or offences.



3. Why we process your data and on what legal basis

3.1 To notify you about the training programme

Purpose	To inform you of the existence of a free training programme in Strategic Design, delivered by POLI.design and consistent with the course of study you completed, and to collect any expression of interest you may wish to make.
Legal basis	Our legitimate interest, pursuant to Article 6(1)(f) of the Regulation.
What interest	POLI.design's interest in offering its students and alumni a training programme that it delivers directly, in the same subject area as the programmes they attended, and in maintaining an educational relationship with them. The programme is designed and delivered by POLI.design with the contribution of Harmonic Innovation Group.
Your right	You may object at any time, without having to give us a reason and at no cost. From the moment we receive your objection, we will not send you any further communications relating to this purpose. See point 7.

3.2 If you express interest in participating

Purpose	To manage your enrolment in the training programme, provide you with organisational and educational information, and manage your participation.
Legal basis	Your consent, pursuant to Article 6(1)(a) of the Regulation.
Withdrawal	You may withdraw your consent at any time, without affecting the lawfulness of processing carried out before the withdrawal.

We do not make automated decisions concerning you, and we do not carry out profiling under Article 22 of the Regulation. The recipients of this communication were selected on the basis of the Master's programme attended and your academic and professional background.

Your data is not used for personnel recruitment and selection purposes, nor disclosed to any party for such purposes. Should POLI.design intend in the future to process your data for purposes other than those indicated in point 3, we will inform you in advance and, where necessary, ask for your consent.



4. Who we share your data with

4.1 Harmonic Innovation Group

Harmonic Innovation Group, with registered office in Rome, Largo di Torre Argentina, 11 — tax code and VAT No. 16274141007, contributes to the design of the programme and delivers part of the training hours. It acts as **data processor** pursuant to Article 28 of the Regulation, on the basis of documented instructions given by POLI.design, and has access only to the data necessary to carry out the educational activity. It may not use your data for its own purposes.

4.2 Other parties

Your data may be processed by authorised and instructed POLI.design staff, by the management of the relevant Master's programme, and by suppliers acting as data processors (in particular: partner companies for the course, cloud services for enrolment and CRM management, email hosting service and cloud back-up service, and website hosting service). It may also be disclosed to public authorities where required by law.

4.3 Transfers outside the European Economic Area

We generally try to avoid transferring data outside the European Union. It remains understood that, should it become necessary, the Controller will be entitled to transfer data to non-EU countries, taking care to adopt all the safeguards required by the GDPR in this regard. All processing operations are carried out using IT/electronic tools, including automated ones, and on paper.

5. How long we retain your data

Processing	Retention period
Data processed for notifying the programme and collecting expressions of interest	24 months from the end of the programme
Data processed in case of enrolment and participation	24 months from the end of the programme, save for longer periods required by law
In the event of your objection or withdrawal of consent	Immediate cessation of processing for the purpose concerned. We retain only the data necessary to follow up on your request and to avoid contacting you again.

The data contained in POLI.design's records relating to the attainment of the qualification is retained according to separate terms, connected to the certification obligations of the course of study, and is not covered by this notice.

6. Provision of data

You are under no obligation to respond to our communication or to enrol in the programme. Failure to respond has no consequences for you and does not in any way affect the qualification you obtained or any other relationship with POLI.design.



7. Your rights

You may exercise, at any time, the rights provided for under Articles 15 to 22 of the Regulation:

Right	What it consists of
Access (Art. 15)	To know whether we process data concerning you and obtain a copy of it
Rectification (Art. 16)	To correct inaccurate data or complete incomplete data
Erasure (Art. 17)	To obtain the deletion of data in the cases provided for
Restriction (Art. 18)	To request that processing be restricted in the cases provided for
Data portability (Art. 20)	To receive, in a structured format, the data processed on the basis of consent
Objection (Art. 21)	To object to processing based on our legitimate interest
Withdrawal of consent (Art. 7)	To withdraw any consent given, at any time

To exercise your rights, you can write to privacy@polidesign.net. We will respond without delay and in any case within one month.

If you believe that the processing of your data violates the law, you may lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) (Piazza Venezia 11, 00187 Rome — www.garanteprivacy.it) or take action before the judicial authority.

8. Updates

This notice is updated as of the date indicated on the cover page. The current version is always available at <https://www.polidesign.net/it/privacy/>