POLITECNICO
MILANO 1863

PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA FOR THE SENDING OF MASS COMMUNICATIONS VIA E-MAIL AND THE USE OF TRACKING TOOLS

This Privacy Policy, provided pursuant to Articles 13 and, where applicable, 14 of EU Regulation No. 679/2016 and Art. 122 of the Privacy Code (Legislative Decree 196/2003), concerns the sending of mass communications via e-mail to lists or groups of recipients through MailUp and the possible detection of openings and clicks, in compliance with the Guidelines of the Italian Data Protection Authority on tracking pixels in e-mails (provision no. 284 of 17 April 2026, web doc. no. 10241943). It does not concern ordinary individual correspondence.

This policy supplements, but does not replace, the additional level policies, which specify the purposes, legal bases and storage times or criteria and are available in the access, registration or use channels.

Data Controller

The Data Controller is the Politecnico di Milano, Piazza Leonardo da Vinci 32, 20133 Milan; the Director General acts on behalf of the Rector pro-tempore. Contact: dirgen@polimi.it.

Internal data processor

The Internal Data Processor is the Manager or Management Manager of the structure responsible for the activity or service to which the communication refers.
The name and contact details of the competent internal manager are indicated in the additional level information relating to the activity or service.

Data Protection Officer and Contact Points

The Data Protection Officer (DPO) can be reached at the e-mail: privacy@polimi.it.

Purpose of processing, legal basis, categories of data and storage period

The communications concern institutional activities, services, initiatives, academic, educational and third mission events of the University and optional updates.
The table describes the general and common framework referred to this processing, the additional level notices then define the specific purposes, the legal bases and the retention period of the information collected.

With regard to the detection of the opening of communications by recipients, it should be noted that it is carried out by means of tracking pixels, i.e. by inserting small images that, when the message received is loaded, can signal its opening. Tracked links, which are associated with an identifier, can instead detect the clicks made by the user.

Without the explicit consent of the user, the University collects at most overall campaign statistics, with identical tools for all recipients and anonymized data.
The submission platform does not constitute a legal bill of materials or change the retention terms of the activity.

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Purposes of the processing for which the personal data are intended	Legal basis of the processing	Categories of personal data subject to processing	Personal data retention period
Purpose 1 To send mass communications via e-mail related to the activities and services of the University, including optional ones.	The applicable legal basis, among those referred to in art. 6, par. 1, letters a), b), c) and e) GDPR, is specified in the information notice of the individual newsletter; where applicable, art. 130 of the Privacy Code also applies.	Contact details, identification and membership data, preferences and information relevant to the activity.	For storage times and criteria, please refer to the additional level information relating to the individual activities or reference services.
Purpose 2 Possible detection of openings and clicks for the purposes previously explained to the data subject.	Art. 122 Privacy Code: prior consent, except for the exceptions to be documented: (i) global campaign statistics, with identical pixels for all recipients and anonymized data; (ii) institutional or service messages that the University is legally obliged to forward; (iii) authentication security measures. For the subsequent processing of the data collected: art. 6, par. 1, lett. a) GDPR.	Technical identifiers, opens and clicks, date and time; IP address and information on the mail client only if actually collected.	For tracking data referable to the individual recipient and for any copies in the sending platform, please refer to the additional level information relating to the reference activity or service. Anonymous aggregate statistics: these are not personal data.

Nature of the provision of data

The mandatory or optional nature of the provision of data and the consequences of failure to provide it are specified in the detailed information on bulk communications. Consent to optional communications is not a condition for accessing services that do not require it. Registration for an event is not automatically equivalent to subscribing to further newsletters. Refusal or revocation of consent to tracking has no consequence on the receipt of communications or on the use of services.

Processing methods

The data are processed with IT and telematic tools, with access limited to authorized persons and adequate measures pursuant to art. 32 GDPR. Preferences and unsubscriptions are also respected in subsequent imports.

Categories of recipients

The data can be accessed by authorised persons and providers of platforms and technical services, regulated pursuant to Art. 28 GDPR where applicable. Any additional recipients and the roles of other bodies are indicated in the information of the activities or services concerned. The sending of a communication does not involve the communication of contact details to partners or sponsors for their own purposes.

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Transfer to a non-EU country or international organizations

Personal data is processed within the European Economic Area.
If it is necessary to use cloud providers or services located outside the European Economic Area, the transfer takes place in compliance with Chapter V of the GDPR and will be indicated in the information of the activity or service concerned.
The transfer is based: a) on an adequacy decision (Art. 45 GDPR), including the EU-US Data Privacy Framework for certified importers only; b) failing that, on appropriate safeguards pursuant to Art. 46 GDPR (e.g. standard contractual clauses); c) only exceptionally, on the exceptions of Art. 49 GDPR. A copy of the guarantees can be requested at privacy@polimi.it.

Any automated decision-making and profiling activities

Any automated decision-making or profiling activities related to a specific activity or service are described in the relevant additional level notice.

Rights of the data subjects

The data subject may exercise the rights provided for by art. 15-22 GDPR, within the applicable limits, by writing to privacy@polimi.it, and lodge a complaint with the Guarantor for the protection of personal data (Piazza Venezia 11, 00187 Rome – www.garanteprivacy.it). Consent may be revoked at any time, without prejudice to the lawfulness of the previous processing. For processing based on the task of public interest, the right to object provided for by art. 21 GDPR applies.
Optional communications allow unsubscription in the manner indicated in the messages revocation of consent to tracking, which does not interrupt communications, is exercised in a simple way through a link in the footer of each message. Unsubscribing from optional communications does not prevent the sending of necessary messages relating to services requested or due obligations.

Milan, 29th October 2026.