



**Politecnico
di Torino**

Whistleblower Privacy Policy¹ (Art. 13 of the Regulation EU 2016/679)

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 (certified e-mail)

For further information and inquiries write to: 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; 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 you provided at the time of submitting a report of an offense that occurred to the same Data Controller for purposes of:

¹ This privacy policy is updated to ANAC Deliberation No. 311/2023 on “Linee guida in materia di protezione delle persone che segnalano violazioni del diritto dell’Unione e protezione delle persone che segnalano violazioni delle disposizioni normative nazionali”.



Description	Legal basis
<ul style="list-style-type: none"> - preliminary investigation and management of the report; 	<ul style="list-style-type: none"> - art. 6, paragraph 1, let.: <ul style="list-style-type: none"> o c) ["processing is necessary for compliance with a legal obligation to which the controller is subject"] of the GDPR; o e) ["processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"] of the GDPR; - art. 9, paragraph 2, let.: <ul style="list-style-type: none"> o 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; o g) ["processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law (...)"] of the GDPR in accordance with art. 2-sexies lett. dd) del D.lgs. 196/2003;



<ul style="list-style-type: none">- management of data relating to criminal convictions and offences;	<ul style="list-style-type: none">- art. 10:<ul style="list-style-type: none">o ["Processing of personal data relating to criminal convictions and offences or related security measures based on Article 6(1) shall be carried out only under the control of official authority or when the processing is authorised by Union or Member State law (...)] of the GDPR in accordance with art. 2-octies lett. a) del D.lgs. 196/2003.
<ul style="list-style-type: none">- <u>possible</u> communication of your identification data in the context of disciplinary proceedings initiated against the alleged author of the reported conduct, if your identity is indispensable to the defence of the person who has been charged with the disciplinary charge;- <u>possible</u> communication of your identification data in the event when in the procedures of internal and external reporting disclosure of your identity is indispensable also for the purposes of defence of the person involved.	<ul style="list-style-type: none">- art. 6, paragraph 1, let.:<ul style="list-style-type: none">o a) ["processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller"] of the GDPR;

In particular, personal data (personal data, contact details and further connected information) will be collected and processed using electronic and, possibly, paper methods in order to manage the reporting procedure and any consequent actions that may derive from it.



**Politecnico
di Torino**

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 Responsabile della Prevenzione della Corruzione of the Politecnico di Torino.

Politecnico di Torino, if the legal or regulatory requirements exist, may communicate personal data to any public entities (ordinary judicial or accounting authorities, National Anti-Corruption Authority (ANAC), Department of Public Administration). In particular, as provided for in ANAC Deliberation No. 311/2023, any exchange and transmission of by EU institutions, bodies, offices or agencies will take place in compliance with Regulation (EU) 2018/1725.

Personal data are stored in the university servers (located inside Politecnico), the provision and maintenance of the Globaleaks open source platform is entrusted to an external supplier – ISWEB S.p.A. – who acts as Data Processor pursuant to art. 28 of the GDPR.

TRANSFER OF PERSONAL DATA

Your personal data will not be transferred to non-EU countries (*Third Countries*).

PERIOD FOR WHICH PERSONAL DATA ARE STORED

The personal data provided will be stored in compliance with the principles established by art. 5 of the GDPR and in compliance with the archiving obligations imposed by current legislation for the period necessary for ascertaining the validity of the report and, possibly, for the adoption of the consequent disciplinary measure and/or the end of any disputes initiated following the report or at the expiry of the terms for filing an appeal (in any case no later than five years from the date of the communication of the final outcome of the reporting procedure).



**Politecnico
di Torino**

PROVIDING PERSONAL DATA

The provision of personal data is mandatory, failure to provide it could jeopardize the preliminary investigation of the report.

The purpose of Whistleblowing is to protect the reporting subject, it excludes reports made anonymously from its scope of application: such reports, therefore, can be taken into consideration by the University and possibly processed only through other channels where they are adequately detailed, rendered with great detail and able to bring out facts and situations by relating them to specific contexts.

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.

Please contact the Data Controller if you want to exercise your rights. The person involved or the person mentioned in the report, as provided for in ANAC Deliberation No. 311/2023, may not exercise – for the time and to the extent that this constitutes a necessary and proportionate measure and proportionate – the rights normally granted to data subjects by the Regulation (EU) 2016/679.



**Politecnico
di Torino**

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>

This privacy policy has been updated on 14/09/2023