

POLITECNICO DI MILANO
THE DIRECTOR GENERAL

HAVING REGARD TO the Constitution of the Italian Republic, and in particular Article 2, Fundamental Principles;

HAVING REGARD TO the European Convention for the Protection of Human Rights and Fundamental Freedoms;

HAVING REGARD TO Law No. 164 of 14 April 1982, laying down "Rules on the rectification of sex designation";

HAVING REGARD TO Presidential Decree No. 445 of 28 December 2000, laying down the "Consolidated text of legislative and regulatory provisions on administrative documentation";

HAVING REGARD TO Legislative Decree No. 165 of 30 March 2001, "General rules on the organisation of employment in public administrations";

HAVING REGARD TO Legislative Decree No. 196 of 30 June 2003, the "Personal Data Protection Code";

HAVING REGARD TO Legislative Decree No. 150 of 1 September 2011, laying down "Supplementary provisions to the Code of Civil Procedure concerning the reduction and simplification of ordinary civil proceedings, pursuant to Article 54 of Law No. 69 of 18 June 2009";

HAVING REGARD TO Legislative Decree No. 101 of 10 August 2018, laying down "Provisions to adapt national legislation to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation)";

HAVING REGARD TO the Statute of Politecnico di Milano; HAVING REGARD TO the University General Regulations;

HAVING REGARD TO the Code of Ethics and Conduct of Politecnico di Milano;

HAVING REGARD TO the Code for the Protection of Personal Dignity of Politecnico di Milano;

HAVING REGARD TO the Regulations of Politecnico di Milano on the processing of personal data and ICT security, and the resulting Privacy Organisational Model;

HAVING REGARD TO the Director General's decisions concerning the organisation of the administrative Directorates of Politecnico di Milano, including the Education and ICT Directorates;

HAVING REGARD TO the 2019 Guidelines for Italian Universities on the implementation of the Alias Career, issued by the National Conference of Equality Bodies of Italian Universities;

HAVING REGARD TO the Protocol for the activation and management of an alias for first- and second-cycle degree students and applicants in gender transition at Politecnico di Milano, adopted by Director General's Decree No. 4762 of 2 August 2017 and amended by Director General's Decree, Protocol No. 23791 of 1 February 2023 and Director General's Decree No. 7279 of 30 June 2023;

HAVING REGARD TO the request of the Single Guarantee Committee for formal and substantive amendments to the aforesaid Protocol;

HAVING FOUND it necessary to republish the aforesaid Protocol incorporating those requests;

HEREBY DECIDES

Article 1

1. For all the reasons set out in the recitals, the Protocol adopted by Director General's Decree No. 4762 of 2 August 2017 and amended by Director General's Decree No. 1259 of 1 February 2023 and Director General's Decree No. 7279 of 30 June 2023 is republished. Its title is changed to "Protocol for the activation and management of an alias for students enrolled in first- and

second-cycle degree programmes, and applicants thereto, at Politecnico di Milano who wish to identify with a gender different from that shown in their civil-status records”, together with the attached forms, which constitute an integral part of this Decision.

2. Any amendments and/or additions to the Protocol and to the forms attached thereto and expressly referred to in Article 8 shall be adopted by decree of the Director General.

3. The Directors of the Education and ICT Directorates shall identify by name the staff responsible for managing the procedure, in order to ensure the confidentiality required in processing sensitive data connected with implementation of the Protocol.

**PROTOCOL FOR THE ACTIVATION AND MANAGEMENT OF AN ALIAS FOR STUDENTS ENROLLED IN
BACHELOR'S, MASTER'S AND SINGLE-CYCLE MASTER'S DEGREE PROGRAMMES, AND
APPLICANTS THERETO, AT POLITECNICO DI MILANO WHO WISH TO IDENTIFY WITH A GENDER
DIFFERENT FROM THAT SHOWN IN THEIR CIVIL-STATUS RECORDS**

ARTICLE 1

PURPOSE OF THE PROTOCOL

1. In pursuing the same objectives that inspired the Code of Ethics and Conduct of Politecnico di Milano and the Code for the Protection of Personal Dignity of Politecnico di Milano, this Protocol is adopted. It defines the procedure for activating and managing an alias in order to ensure that members of the student body, and prospective students, who wish to identify with a gender different from that recorded in their civil-status records may study in a peaceful environment, where interpersonal relations are based on fairness, mutual respect for freedoms and the inviolability of the person.
2. In order to achieve the purposes set out above, the University works in synergy with the Single Guarantee Committee for equal opportunities, the promotion of the well-being of workers and the prevention of discrimination, in compliance with applicable legislation.
3. Politecnico di Milano, also taking into account the recommendations in the Guidelines for Italian Universities on the implementation of the Alias Career issued by the National Conference of Equality Bodies of Italian Universities, undertakes to ensure full access to the alias career scheme.

ARTICLE 2

ELIGIBLE PERSONS

1. Persons wishing to request activation of an alias must submit an application drawn up using the form attached to this Protocol.
2. The application must be sent from the applicant's Politecnico di Milano institutional email address to the confidential email address sgs@polimi.it.
3. All documentation relating to the "alias" process is handled confidentially and on a restricted-access basis.
4. If a Polimi email address has not yet been assigned, the email address provided at the time of registration on the Online Services portal must be used.
5. A valid identity document must be attached to the application.

ARTICLE 3

ACTIVATION OF THE ALIAS

1. Following submission of the required documentation, the applicant and the Director of the Education Directorate shall jointly sign a confidential agreement which, among other matters, identifies specific contact persons for managing the procedure and ensuring the necessary confidentiality.
2. A managerial decree shall then be issued authorising the amendment, in the IT system that manages student records, of the applicant's data.
3. Through that decree, Politecnico di Milano undertakes to activate the alias on a temporary, non-permanent basis, and to issue the applicant with a new university card showing the alias chosen by the person and their surname, as well as an institutional email address based on the alias.
4. The purpose of the alias is to limit situations of discomfort for members of the student body who have begun a gender transition process or who do not identify with the gender identity shown in their legally valid civil-status records.
5. The alias shall be inseparably linked to the active civil-status record relating to the applicant and shall remain active for as long as the actual academic career continues, without prejudice to requests for discontinuation made by the applicant or the grounds for discontinuation referred to in Article 6 below.

6. The university card may under no circumstances be enabled for services outside the University involving matters beyond the university context alone; for example, it may not be enabled by the treasury institution as a payment card.
7. The university card linked to the alias may be shown only within Politecnico di Milano and may not be used for any purpose or shown outside the University. The original university-issued card may still be used in contexts outside the University.

ARTICLE 4

ISSUANCE OF CERTIFICATES

1. In compliance with applicable legislation, Politecnico di Milano undertakes, where necessary, to provide the applicant with suitable certification for external use relating to the academic career under that person's legally recognised identity. Politecnico di Milano shall not issue any statement or certification concerning the alias.
2. Under Presidential Decree No. 445/2000, the applicant may issue substitute declarations of certification or affidavits concerning personal status and qualities related to their academic career, for use outside the University solely with reference to their legally recognised identity.

ARTICLE 5

OBLIGATIONS OF THE APPLICANT

1. The applicant may notify the contact persons referred to in Article 3 in advance and in a timely manner of the intention to perform acts within the University that have external relevance (for example, participation in internships, international mobility projects or applications for scholarships), undertaking to verify and agree with those contact persons whether and how those intentions may be pursued while continuing to use their chosen identity.
2. The applicant undertakes to inform the University of any circumstance that may affect the content and validity of the Confidential Agreement. In particular, where undertaking a gender transition, the applicant undertakes to notify the contact persons without delay of the court judgment rectifying the designation of gender and name.

ARTICLE 6

BREACH OF THE PROCEDURE

1. Where there are reasonable grounds to believe that the applicant is breaching this Protocol and the Confidential Agreement, the alias shall be immediately suspended as a precautionary measure by order of the Director of the Education Directorate, pending further decisions. The University, through the competent bodies and officers, reserves the right to assess any disciplinary action.

ARTICLE 7

VALIDITY OF THE CONFIDENTIAL AGREEMENT

1. The Confidential Agreement, and with it the alias identity, takes effect from the date of signature and is automatically renewed at the beginning of each academic year, unless the person concerned wishes to deactivate/suspend the alias identity or a judgment has been issued by the competent court concerning the rectification of the designation of gender.
2. The Confidential Agreement remains effective when moving from a first-cycle to a second-cycle degree programme, provided that enrolment in the subsequent level occurs within 12 (twelve) months of obtaining the preceding qualification. Exceptional cases remain subject to individual assessment by the competent persons.
3. Where the applicant is undergoing a gender affirmation process, until a final judgment rectifying the designation of gender is issued by the competent court, all academic records and related certificates, including the degree parchment, shall refer to the applicant's civil-status data having legal validity.
4. The applicant may request to be proclaimed at the graduation ceremony using either the legal

name or the alias name.

5. If the final rectification judgment is issued after completion of studies, it shall be possible to request a degree parchment bearing the new legal name.

6. Persons with an active alias career at the University may also use their chosen name in University electoral procedures, limited to internal procedural phases, excluding all acts having external effect or necessarily requiring use of the civil-status name pursuant to an express legal provision or in order to ensure proper fulfilment of statutory obligations.

ARTICLE 8 ATTACHMENTS

1. The following documents form an integral part of this Protocol: (a) Alias application form; (b) Confidential Agreement form; (c) Information notice on the processing of sensitive data.
2. Any amendments and/or additions to the documents listed above shall be adopted by decree of the Director General.

ARTICLE 9 PROCESSING OF PERSONAL DATA

1. Pursuant to and for the purposes of Legislative Decree No. 196 of 30 June 2003, the "Personal Data Protection Code", insofar as its provisions on the processing of sensitive data remain applicable, and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, Politecnico di Milano shall process the data set out in the Confidential Agreement solely for purposes connected with the procedures specified therein.
2. The information notice included in the Confidential Agreement shall set out in detail all necessary information concerning the processing of the data.

ARTICLE 10 ENTRY INTO FORCE AND PUBLICATION

1. This Protocol for the activation and management of an alias for students enrolled in Bachelor's, Master's and single-cycle Master's degree programmes, and applicants thereto, in gender transition at Politecnico di Milano, is adopted by Decision of the Director General and enters into force on the day following the date of publication on the University website: <http://www.normativa.polimi.it/>.

THE DIRECTOR GENERAL Eng. Graziano Dragoni

Digitally signed pursuant to the Digital Administration Code.



**POLITECNICO
MILANO 1863**

To:

Politecnico di Milano
Piazza Leonardo da Vinci 32
20133 Milan

**FORM FOR REQUESTING ACTIVATION OF AN ALIAS FOR STUDENTS ENROLLED IN BACHELOR'S,
MASTER'S AND SINGLE-CYCLE MASTER'S DEGREE PROGRAMMES, AND APPLICANTS THERETO,
AT POLITECNICO DI MILANO WHO WISH TO IDENTIFY WITH A GENDER DIFFERENT FROM THAT
SHOWN IN THEIR CIVIL-STATUS RECORDS**

I, _____

Place of birth _____

Date of birth _____ tax code _____

person code _____

pursuant to Law No. 164/1982 and to the Protocol for the activation and management of an alias for
persons who wish to identify with a gender different from that shown in their civil-status records,

HEREBY REQUEST

to adopt the following "alias" identity: _____.

For this purpose, I attach a valid identity document to this application.

Milan, date _____

Signature of the applicant _____

CONFIDENTIAL AGREEMENT

Having regard to the Protocol for the activation and management of an alias for students enrolled in Bachelor's, Master's and single-cycle Master's degree programmes, and applicants thereto, at Politecnico di Milano who are in gender transition;

Considering the request submitted by _____ to activate an "alias", by assigning a temporary identity valid only within the University, in order to ensure the effective exercise of the right to personal identity, which falls within the fundamental rights of the person (Article 2 of the Constitution);

Taking note that _____ declares, solely for the purposes of this Agreement, that the chosen name is _____;

BETWEEN

_____, place of birth _____,

date of birth _____,

address for service for the purposes of this deed: Via _____ No. _____,

person code No. _____ issued by Politecnico di Milano, hereinafter referred to as "the applicant",

AND

Politecnico di Milano, represented by the Director of the Education Directorate,

IT IS AGREED AS FOLLOWS

- The University undertakes to activate an "alias" for the applicant by assigning a temporary, transitional and non-permanent identity, and to issue the applicant with a new university card showing the alias chosen by the person concerned, the surname and the person code.
- The University also undertakes to activate for the applicant an email address containing only the alias chosen by the person concerned.
- The "alias" arises from the integration of the "actual" civil-status record for members of the student body who wish to identify with a gender different from that shown in their civil-status records. In lists and applications used by University staff, "alias first name surname" will be displayed.
- The "alias" shall be inseparably linked to the civil-status data and person code and shall continue for as long as the actual academic career continues, without prejudice to requests for discontinuation made by the applicant or the grounds for discontinuation specified below.
- The university card linked to the alias may be shown only within Politecnico di Milano and may not be used for any purpose or shown outside the University.
- The University shall not issue any statement or certification relating to the alias.
- The University identifies the following contact persons for the management of the procedure: (a) Director of the Education Directorate; (b) ICT Director; (c) Staff of the Educational Offer and Education Management Office.
- Whenever necessary and permitted by law, the University undertakes to provide the applicant with suitable certification for external use of the academic career under the

applicant's legally recognised identity.

- The applicant acknowledges that any substitute declaration of certification or affidavit concerning personal status and qualities related to the academic career, signed by the applicant under Presidential Decree No. 445/2000 and used outside Politecnico di Milano, may only refer to the applicant's legally recognised identity.
- The applicant undertakes to notify the contact persons named above in advance of the intention to perform acts within the University having external relevance (for example, participation in internships or international mobility projects), undertaking to verify and agree with the contact persons whether and how those intentions may be pursued.
- The applicant acknowledges that qualifications and related certificates, where graduation occurs before the issue by the competent authority of the final order rectifying the designation of sex, shall show the actual civil-status data stated in the identity document issued by the Italian State.
- Where there are reasonable grounds to believe that the applicant has breached, even only in part, this Agreement, the "alias" shall be immediately suspended as a precautionary measure by order of the Director of the Education Directorate. The applicant shall be referred to the Student Disciplinary Committee; if it ascertains an actual breach of the Confidential Agreement, the "alias" shall be deactivated and the applicant shall return the university card, without prejudice to any further sanctions that the Student Disciplinary Committee may decide to apply to the actual academic career.
- The applicant undertakes to inform the University of any circumstance that may affect the content and effectiveness of this Agreement. In particular, by way of example and without limitation, the applicant undertakes to notify the contact persons without delay of the court judgment rectifying the designation of gender, or the decision to discontinue the process undertaken to obtain that rectification.

This Confidential Agreement takes effect from the date of signature and is automatically renewed at the beginning of each academic year, unless the person concerned expresses the intention to deactivate/suspend the alias identity.

The complete information notice on the processing of data under this Confidential Agreement and the Protocol for the activation and management of an alias for students enrolled in Bachelor's, Master's and single-cycle Master's degree programmes, and applicants thereto, at Politecnico di Milano who wish to identify with a gender different from that shown in their civil-status records is attached hereto and must be signed by the person concerned in acceptance. The Court of Milan shall have exclusive jurisdiction over any dispute arising from this Agreement.

Milan, _____

For Politecnico di Milano
The Director of the Education Directorate

INFORMATION NOTICE AND DECLARATION OF CONSENT TO THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLE 13 OF THE GDPR (GENERAL DATA PROTECTION REGULATION), REGULATION (EU) NO. 679/2016 OF 27 APRIL 2016

This information notice is provided pursuant to Article 13 of Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and in compliance with legislation on the processing of personal data and the free movement of such data.

Data Controller: Politecnico di Milano - Director General, delegated by the Rector pro tempore - contact: dirgen@polimi.it.

Internal Data Processor: Dr Assunta Marrese - contact: SGS@polimi.it. The data will be processed by further authorised and duly instructed persons in compliance with current legislation.

Data Protection Officer and contact point: privacy@polimi.it.

Purposes of processing, legal basis, categories of data and retention period. For the application of European and national legislation on the matter (Regulation (EU) 2016/679, hereinafter the "Regulation"), you are informed that your personal data will be used for the following purposes:

Purpose: activation and management of an alias for students enrolled in first- and second-cycle degree programmes, and applicants thereto, in gender transition. Legal basis: Article 6(1)(e) of the Regulation, for purposes of public interest and institutional purposes of the body. Categories of personal data processed: identifying data; civil-status data; data on related medical treatment; related legal data.

Nature of the data. Providing the data is optional. Refusal to provide the data makes it impossible to activate and manage an alias. The data collected are mandatory. Failure to provide them and/or any refusal to respond makes it impossible to access the confidential information referred to in the Confidential Agreement.

Special categories of data. Any personal data falling within the category referred to in Article 9(1) of Regulation (EU) 2016/679, namely health data, are processed for the purpose of activating and managing an alias for students enrolled in degree programmes who wish to identify with a gender different from that shown in their civil-status records.

The purpose of the processing is to ensure an alias for the applicant from the student body who wishes to identify with a gender different from that shown in their civil-status records, so that during their course of study their interpersonal relations are based on fairness, mutual respect for freedoms and the inviolability of the person.

Such data are processed for reasons of substantial public interest and to safeguard the data subject's fundamental rights, pursuant to Article 9(2)(g) and Article 2-sexies(2)(bb) of Legislative Decree No. 196 of 2003, as amended by Legislative Decree No. 101 of 2018: processing for purposes of public interest to ensure education and training activities in the university sector. The processing shall be proportionate to the purpose pursued, with appropriate data protection measures in place.

Methods of processing. Processing carried out for the stated purpose of activating and managing an alias may take place on paper or digital media, manually and/or by electronic or otherwise automated means. The data are also kept in paper archives for the duration of the processing and in digital form indefinitely, in view of the transparency and proper functioning obligations of public administration. Access to data collected for the purpose is permitted to duly authorised staff.

Categories of recipients. In relation to the purposes indicated, your personal data may also be

disclosed, including in anonymous form, to other public administrations where they must process them in proceedings falling within their institutional competence, as well as to all public or private entities to which disclosure is mandatory under applicable European law, legislation or regulations, and to insurance bodies for any accident claims.

Data retention period. For archival and retention purposes, data necessary for the proper functioning of public administration shall be retained indefinitely, in compliance with the principles of transparency, lawfulness, proportionality and data minimisation.

Transfer to non-EU countries. Personal data will not be transferred in any way to non-EU countries.

Rights of data subjects. As a data subject, you may ask the Controller at any time: confirmation of the existence or otherwise of personal data concerning you; access to your personal data and related information; rectification of inaccurate data or completion of incomplete data; erasure of personal data concerning you (where one of the conditions in Article 17(1) of the Regulation applies, subject to the exceptions in Article 17(3)); restriction of processing (where one of the cases in Article 18(1) of the Regulation applies); anonymisation or blocking of data processed in breach of the law, including data whose retention is not necessary for the purposes for which they were collected or subsequently processed.

As a data subject, you also have the right to object, in whole or in part: for legitimate reasons, to the processing of personal data concerning you, even where relevant to the purpose of collection; and to the processing of personal data concerning you for the purpose of sending promotional material concerning Politecnico di Milano educational initiatives and cultural events.

These rights may be exercised by contacting privacy@polimi.it.

If you consider that your rights have been infringed by the Controller and/or a third party, you have the right to lodge a complaint with the Italian Data Protection Authority and/or another competent supervisory authority pursuant to the Regulation.

Milan, _____
