



**Politecnico  
di Torino**



## **PRIVACY POLICY for research on AI-Assisted Network Security (Art. 13 of the General Data Protection Regulation – 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 OF JOINT DATA CONTROLLERS

The **Data Controller** is Politecnico di Torino, represented by the Rector, with statutory seat in Corso Duca degli Abruzzi, n. 24, 10129 – Turin, Italy.

You can contact the Data Controller at: [politecnicoditorino@pec.polito.it](mailto:politecnicoditorino@pec.polito.it) (certified e-mail).

For further information and inquiries write to: [privacy@polito.it](mailto: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](mailto:dpo@polito.it); [dpo@pec.polito.it](mailto:dpo@pec.polito.it) (certified e-mail).

The **Data Controller** is Huawei Technologies France SASU, represented by the President, with statutory seat in 18-20 quai du Point du Jour, 92110 Boulogne-Billancourt, France.

You can contact the Data Controller at: <https://www.huawei.com/en/personal-data-request>

For further information and inquiries write to: <https://www.huawei.com/en/personal-data-request>

You can contact the **Data Protection Officer** (DPO) of Huawei Technologies France for inquiries on the processing of your personal data and your rights at: <https://www.huawei.com/en/personal-data-request>

### PRINCIPLES, LEGAL BASIS AND PURPOSES OF THE PROCESSING OF PERSONAL DATA

Joint Data Controllers will process your personal data in accordance with the principles of data minimisation, accuracy, storage limitation, integrity,



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confidentiality and accountability (article 5, paragraph 1 of the GDPR) and pursuant to:

- art. 6, paragraph 1, letter e) of the GDPR "*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*" for research on AI-Assisted Network Security by the Politecnico di Torino;
- art. 6, paragraph 1, letter f) of the GDPR "*processing is necessary for legitimate interests*" of Huawei Technologies France to perform research focusing on the protection of network infrastructure

Joint Data Controllers will process your data (IP addresses, username and password used by attackers to perform brute force login) in our servers in electronic format.

#### PERSONS AUTHORISED TO PROCESS THE PERSONAL DATA, POSSIBLE RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA AND DATA PROCESSOR

The data processed for the aforementioned purposes will be communicated, or will in any case be accessible, to the staff identified by Huawei Technologies France and by the Politecnico di Torino, who will be adequately instructed by the Joint Data Controllers.

Personal data are stored in the Joint Controllers servers (located inside Parties) and/or in external servers which belong to providers of technical and administrative services. These service providers may have access to your personal data exclusively for the services they render. In this case, they will be engaged as Processors in accordance with article 28 of the GDPR.

#### TRANSFER OF PERSONAL DATA

The personal data described above will be transferred to China by Huawei Technologies France.

In the event that the personal data are transferred to a third country that does not ensure an adequate level of protection of personal data, the controller complies with applicable legal requirements for providing adequate



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safeguards by incorporating the Standard Contractual Clauses with relevant supplementary measures for such transfer.

You can obtain a copy of the Standard Contractual Clauses here: [https://commission.europa.eu/publications/standard-contractual-clauses-international-transfers\\_en](https://commission.europa.eu/publications/standard-contractual-clauses-international-transfers_en), or by sending a request to us through our dedicated Data Subject Right Portal: <https://www.huawei.com/en/personal-data-request>.

## PERIOD FOR WHICH PERSONAL DATA ARE STORED

Three Years.

## PROVIDING PERSONAL DATA

Providing your personal data is voluntary; however any refusal makes it impossible to fulfill the purposes indicated.

## 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 Joint Data Controllers) 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.
- obtain the essence of the joint-controllership arrangement that has been executed between the Joint Data Controllers.

Please contact the Joint Data Controllers if you want to exercise your rights.



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## 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>

If you believe that we are not processing your personal data in accordance with this privacy policy or the applicable data protection laws, you are entitled to lodge a complaint with your data protection authority.

List of relevant national Data Protection authorities:  
[https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

This privacy statement has been updated on 31/8/2023