# **PRIVACY POLICY**

(Information pursuant to art. 13 and art. 14 of Reg. (UE) 679/2016, GDPR)

### Dear all,

Below you can find information that it is important to bring to your attention, not only to comply with legal obligations but also because transparency and fairness to interested parties is a fundamental part of our business.

#### **Data controller**

The Data Controller of your personal data is **The English International School of Padua S.r.l.**, responsible to you for the legitimate and correct use of your personal data. You can contact us for any information or request at the following addresses:

VAT Number	IT00217240282
Head Office	VIA Forcellini 168 - 35128, Padova (PD) - Italia
Contacts	049 8022503, eisp@pec.it

### **Data protection officer**

The Data Protection Officer (DPO) can be contacted at:

Contacts	dpo@privacystudio.it - Xifram S.r.l.
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#### Data source

Images and videos are automatically taken by the video surveillance system installed at the Organisation. Some of these sources are publicly accessible: No.

## **Treatments**

Your personal data is collected and processed, through automated, semi-automated and non-automated methods, as specified below:

### **Management and Maintenance of IT systems**

Purpose and legal basis	- Management and maintenance of the network and computer systems, based on: Legitimate interest, Legal obligation, Legitimate interest in the protection of the network and computer systems; legal obligation limited to the provisions of the legislation on system administrators
Data categories	Access and identification data
Storage time*	Common data: 2 years from the year of termination of the contractual relationship for accounts, passwords and usernames; 18 months with regard to obligations concerning system administrators
Data recipients	Data processors appointed according to art. 28 Reg. UE 2016/679 (see register of responsible persons), other subjects for whom the communication of data is necessary for the achievement of the owner's declared purposes

#### Video Surveillance

Purpose and legal basis	- Protection of company assets; safety of workers; organisational and production requirements, based on: Legitimate interest, protection of company assets; safety of workers; organisational and production requirements
Data categories	Photographic audio-video recordings
Storage time*	Common data: As stated in the specific document

Data recipients	Authorities and public administrations for which there is a legal obligation to communicate, Data
	Processors appointed according to art. 28 Reg. UE 2016/679 (see register of responsible persons),
	other subjects for whom the communication of data is necessary for the achievement of the
	owner's declared purposes

### **Defence of Data Controller's interests and rights**

Purpose and legal basis	- Prevent and/or detect any abuse and defend the rights and interests of the owner, on the basis of: Legitimate interest, protect the rights and interests in court or in the preparatory stages to its possible establishment
Data categories	Data useful for defending the rights and interests of the Data Controller
Storage time*	Data useful for the defence of the interests and rights of the Data Controller: The data will be kept until the Data Controller has an interest in exercising its right or interest
Data recipients	Authorities and public administrations for which there is a legal obligation to communicate, Data Processors appointed according to art. 28 Reg. UE 2016/679 (see register of responsible persons), other subjects for whom the communication of data is necessary for the achievement of the owner's declared purposes

Management of personal data protection requirements

Purpose and	- Data protection requirements, based on: Legal obligation, To be specified
legal basis	
Data categories	Personal data, Contact data, Address data
Storage time*	Common data: For the time strictly necessary for the implementation of the purposes
Data recipients	Authorities and public administrations for which there is a legal obligation to communicate, Data
	Processors appointed according to art. 28 Reg. UE 2016/679 (see register of responsible persons),
	other subjects for whom the communication of data is necessary for the achievement of the
	owner's declared purposes

<sup>\*</sup> In addition to the time needed to mature prescriptive terms about each other's rights and the storage time of backups.

## **Automated Process**

Processing is not based on automated decision-making.

## **Provision of Data**

Failure to provide mandatory data could have legal and contractual consequences while failure to provide optional data could make it impossible to carry out the processing or its partial execution. Therefore, in the event of failure to provide the data, the data subject may not obtain the expected result or obtain it only partially.

### Data transfer outside the EU

The processing of personal data (e.g. memorisation, filing, and conservation of data on its servers or in the cloud) will be limited to the areas of circulation and processing of personal data of countries within the European Union, with express prohibition to transfer them to countries outside the EU that do not guarantee (or in the absence of) an adequate level of protection, that is, in the absence of protection instruments provided by EU Regulation 2016/679 (third country deemed adequate by the European Commission, group BCR, model contractual clauses, consent of the interested parties, etc.).

## Rights of interested party

- You have the right, according to article 15 and following of Reg. EU 2016/679 to request the Data Controller access to your personal data, as well as their rectification and cancellation or oblivion;
- You also have the right to request data portability or restriction of processing;
- You have the right, for reasons related to your particular situation, to object to the processing based on the legitimate interest of the personal data concerning you;
- You have the right to view the essential contents of any joint ownership agreements signed;
- For processing based on consent, you have the right to withdraw your consent at any time, without prejudice to the lawfulness of the processing based on the consent given before the withdrawal;
- You can also lodge a complaint to the Data Protection Authority, based in Piazza Venezia 11, 00187 Rome protocollo@pec.gdpd.it.

To exercise your rights or to request additional information, you can contact the Data Controller through the contact information above.

## Changes to this policy

We reserve the right to update our Privacy Policy. The changes will be communicated and we will update the date in this Privacy Policy. Therefore, we recommend periodic consultation of our Privacy Policy, also by requesting a copy from the Data Controller.

Last updated 07/07/2023