



INFORMATION ON THE PROCESSING OF PERSONAL DATA

(artt. 13 e 14 Reg. UE 2016/679 e D.lgs 196/2003 e smi)

Dear Parent/Guardian,

Please find below some information that is necessary to bring to your knowledge, not only to comply with legal obligations but also because transparency and fairness toward interested parties are 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.** (VAT IT00217240282) responsible towards you for the legitimate and correct use of your personal data. For any information you can use the following contacts:

Head Office	VIA FORCELLINI 168 - 35128, Padova (PD)
Telephone	049 8022503
E-mail	info@eisp.it

For treatment that includes the publication of content on social networks, the Data Controller has agreed on standard co-ownership agreements with the owners of the social platforms.

Data Protection Officer

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

E-mail	dpo@eisp.it
PEC	dataprotectionofficer@pec.it

Categories of data processed and source of data

For the treatments, the Data Controller will process common data, such as personal data, contact data, address data, payment data, data relating to purchases or use of services, access, and identification data, data relating to identification/recognition documents, data on the composition of the household, assessment data, attendance/absence data. Among the categories of particular data, health data, and religious or philosophical beliefs may be processed.

The data processed are communicated by the interested party (student and parent/guardian) or by third parties, such as authorities and public structures (e.g. the relevant ULSS), and/or collected from sources accessible to the public.

Treatments

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

Treatments	Purpose	Legal Basis	Data retention*
School Front Office	Monitoring of people entering the school premises; Filtering of phone calls	Legitimate interest in the protection of company assets, personal safety, and organisational needs	1 year from start of data collection



Management of school activity	Organisation and implementation of school activity	Execution of a contract and/or pre-contractual measures; Legal obligation	10 years from the year in which the effects of the last contract ceased
Management of educational and recreational activities	Organisation and implementation of educational and recreational activities	Execution of a contract and/or pre-contractual measures; Legal obligation	10 years from the year in which the effects of the last contract ceased
Management of school trips	Organisation and implementation of school trips	Execution of a contract and/or pre-contractual measures	10 years from the year in which the effects of the last contract ceased
Management of school transportation	Transportation of students to/from home-school	Execution of a contract and/or pre-contractual measures	10 years from the year in which the effects of the last contract ceased
Management of school canteen service	Providing school canteen service	Execution of a contract and/or pre-contractual measures; For any particular data the treatment will take place on the basis of consent**	10 years from the year in which the effects of the last contract ceased; Until the consent is revoked for particular data. Then the treatment will be limited to mere conservation for 10 years from the year in which the consent was revoked
Management of health data	Fulfill the mandatory obligations in social and health matters	Legal obligation; public interest; For any particular data, the treatment will take place based on the public interest in the public health sector	As defined by the regulatory obligation
Health and Safety of students and other users	To protect the health and safety of students and other users	Consent of the interested party**	Until the effects of the last contract ceased
Multimedia content creation	Creation and use of multimedia content, in whole or in part	Consent of the interested party**	Until the consent is revoked. Then the treatment will be limited to mere conservation for 10 years from the year in which the consent was revoked
Photographic audio-video recordings and subsequent publication	Sponsorship of the owner's activities, publication of the directory	Consent of the interested party**	Until the consent is revoked. Then the treatment will be limited to mere conservation for 10 years from the year in which the consent was revoked



Quality of the service	Verify the quality of service	Legitimate interest in verifying compliance with internal procedures	10 years from the year in which the effects of the last contract ceased
Marketing and communication activities	Marketing (analysis and market surveys), sending of informative material and/or advertising	Consent of the interested party**	Until the consent is revoked. Then the treatment will be limited to mere conservation for 10 years from the year in which the consent was revoked
Sale and commercial activity prior to the sale	Promotional activities	Execution of a contract and/or pre-contractual measures; Legitimate interest in promoting their own activities	10 years from the relevant year
Customer service	Checking the level of the service satisfaction	Execution of a contract and/or pre-contractual measures;	10 years from the year in which the effects of the last contract ceased
Accounting	Keeping of accounting records; Tax compliance	Legal obligation	10 years from the year in which the effects of the last contract ceased
Video surveillance	Protection of corporate assets; Personal safety	Legitimate interest of the Data Controller in the protection of company assets and personal safety	In accordance with what is specified in the relevant document
Management and maintenance of IT systems	Management and maintenance of the network and IT systems	Legitimate interest in the protection of the network and IT systems; Legal obligation limited to the provisions of the legislation on system administrators	10 years from the year of termination of the contractual relationship for accounts, passwords and usernames; 13 months as regards the obligations relating to system administrators
Protection of interests and rights of the Data Controller	Prevent and/or detect any abuse and protect the rights and interests of the owner	Legitimate interest; Protect the rights and interests in court or in the phases preparatory to its eventual establishment	The data will be kept as long as the Data Controller has an interest in exercising their right or interest

* In addition to the time necessary for the statute of limitations to mature in relation to reciprocal rights and the backup retention time.

** if you do not provide consent, personal data will not be processed for the specific purposes. Consent can be revoked at any time by contacting the owner at the contact details indicated above.



Provision of Data

For the aforementioned purposes, the provision of your data is a requirement, in case of failure to provide it may not be possible to carry out the treatment.

Data Recipients

Your data may be communicated exclusively for technical and operational needs strictly connected to the aforementioned purposes, to subjects who process the data on behalf of the owner, appointed as authorised or responsible for the treatment under art. 28-29 of the EU Reg. of 2016/679 as well as to public structures concerning which there is a legal obligation to communicate (by way of example and not exhaustively, the ULSS of reference).

Non-EU data transfer

The processing of personal data (e.g. storage, archiving, and conservation of data on its servers or in the cloud) will be limited to the areas of circulation and processing of personal data in countries belonging to the European Union, with the express prohibition of transferring them to countries outside the EU that do not guarantee (or in the absence of) an adequate level of protection, or, in the absence of protection instruments provided for by EU Regulation 2016/679 (the third country deemed adequate by the European Commission, group BCR, model contractual clauses, consent of interested parties, etc.). For Google Workspace for Education services, a specific disclosure has been prepared.

Rights of the interested party

- The parent/guardian has the right, according to the provisions of article 15 and following of EU Reg. 2016/679, to request the Data Controller to access his/her personal data, as well as their correction and cancellation or oblivion.
- The parent/guardian has the right to request data portability or limitation of processing;
- The parent/guardian has the right, for reasons related to his/her particular situation, to object to the processing based on the legitimate interest of his/her personal data;
- For treatments based on consent, the parent/guardian has the right to revoke the consent at any time, without prejudice to the lawfulness of the treatment based on the consent given before the revocation;
- The parent /guardian has the right to view the essential contents of the joint controller agreements;
- The parent/guardian can advance a complaint with the Guarantor Authority for the protection of personal data, with a registered office in Piazza Venezia 11, 00187 – Rome – protocol@pec.gdgd.it.

To exercise his/her rights or to request additional information, the parent/guardian can contact the Data Controller using the contact information above.

Changes to the policy

We reserve the right to update our Privacy Policy. Changes will be communicated and we will update the date in this Privacy Policy. Therefore, we recommend periodic consultation of our Information on the processing of personal data, and also requesting a copy from the Data Controller.

Last updated 20/12/2022



GOOGLE WORKSPACE FOR EDUCATION - PARENT OR GUARDIAN CONSENT

Dear Parent/Guardian,

EISP S.r.l. uses Google Workspace for Education, and we are seeking your permission to provide and manage a Google Workspace for Education account for the student. Google Workspace for Education is a set of education productivity tools from Google including Gmail, Calendar, Docs, Classroom. EISP S.r.l. students will use their Google Workspace accounts to complete assignments, communicate with their teachers, and learn digital citizenship skills.

The following notice replies to common queries on how Google collects uses and discloses personal information of enrolled students:

- Which personal information does Google collect?
- How does Google use this information?
- Does Google disclose the enrolled student's personal information?
- Does Google use primary and secondary students' personal information to serve targeted advertising?
- Can the enrolled student share information with other people using the Google Workspace for Education account?

We invite you to read this document carefully, forward any questions and then sign on the relevant section to confirm that you have read the information and that you give your consent. Without your consent, we will not create a Google Workspace for Education account for the enrolled student. The denial of the approval of the use of Google services can impact the student's learning experience, for example, students who cannot use Google services may need to use other software to complete homework or work together with their classmates.

Information about Google Workspace for parents and guardians

This policy describes the personal information we provide to Google in connection with accounts. How Google collects, uses, and discloses student personal information linked to those accounts. Through their Google Workspace for Education accounts, students can access and use the following "Main Services" offered by Google and described at the address https://workspace.google.com/terms/user_features.html:

- Gmail
- Calendar
- Chrome Sync
- Classwork
- Cloud Search
- Contacts
- Documents, paper, presentations, forms
- Drive
- Groups
- Google Chat, Google Meet, Google Talk
- Jamboard
- Keep
- Sites
- Vault

In addition, we also allow students to access certain other Google services with their Google Workspace for Education accounts. Specifically, the student may have access to the following "Additional Services":

- YouTube
- Blogger
- Google Maps
- Google Earth
- CS First

In the Google Workspace for Education Privacy Statement, Google provides information about the data it collects and how it uses and discloses the information it collects from Google Workspace for Education accounts. You can view the policy online at https://workspace.google.com/terms/education_privacy.html We recommend reading this entire document, but below you can find the answers to some of the more common questions.



WHAT PERSONAL INFORMATION DOES GOOGLE COLLECT?

When creating a student account, EISP S.r.l may provide Google with certain personal information about the student, including, for example, name, email address, and password. Google may collect personal information from students, such as telephone numbers for account recovery or a profile photo added to the Google Workspace for Education account.

When a student uses Google services, Google also collects information based on the use of those services. This includes:

- device information, such as the hardware model, operating system version, unique device identifiers, and mobile network information including phone number;
- log information, including details of how a user used Google services, device event information, and the user's Internet protocol (IP) address;
- location information, as determined by various technologies including IP address, GPS, and other sensors;
- unique application numbers, such as application version number;
- cookies or similar technologies which are used to collect and store information about a browser or device, such as preferred language and other settings.

HOW DOES GOOGLE USE THIS INFORMATION?

In Google Workspace for Education Core Services, Google uses students' personal information to provide, maintain, and protect the services. Google does not serve adverts in the Core Services or use personal information collected in the Core Services for advertising purposes.

In Google Additional Services, Google uses the information collected from all Additional Services to provide, maintain, protect and improve them, to develop new ones, and to protect Google and its users. Google may also use this information to offer tailored content, such as more relevant search results. Google may combine personal information from one service with information, (including personal information), from other Google services.

DOES GOOGLE USE STUDENT PERSONAL INFORMATION FOR USERS IN PRIMARY AND SECONDARY SCHOOLS TO TARGET ADVERTISING?

No. For Google Workspace Education users in primary and secondary schools, Google does not use any user personal information (or any information associated with a Google Workspace for Education Account) to target adverts, whether in Core Services or in other Additional Services accessed while using a Google Workspace for Education account.

CAN THE STUDENT SHARE INFORMATION WITH OTHERS USING THE GOOGLE WORKSPACE FOR EDUCATION ACCOUNT?

We may allow students to access Google services such as Google Docs and Sites, which include features where users can share information with others or publicly. When users share information publicly, it may be indexable by search engines, including Google.

WILL GOOGLE DISCLOSE THE STUDENT'S PERSONAL INFORMATION?

Google will not share personal information with companies, organisations, and individuals outside of Google unless one of the following circumstances applies:

- **With parent/guardian consent.** Google will share personal information with companies, organisations, or individuals outside of Google when it has parent/guardian's consent (for users below the age of consent), which may be obtained through Google Workspace for Education schools.
- **With EISP S.r.l** Google Workspace for Education accounts, since they are school-managed accounts, and give administrators access to information stored in them.
- **For external use.** Google may disclose personal information to affiliates or other companies or individuals trusted by Google to process it on behalf of and under Google's instructions and by Google Workspace for Education Privacy Policy and any other appropriate measures related to confidentiality and security.
- **For legal reasons.** Google will share personal information with companies, organisations, or individuals outside of Google if it believes that access, use, preservation, or disclosure of the information is reasonably necessary to:
 - ✓ meet any applicable law, regulation, legal process, or enforceable governmental request;
 - ✓ apply applicable Terms of Service, including investigation of potential violations;
 - ✓ detect, prevent, or otherwise address fraud, security, or technical issues;
 - ✓ protect rights, property, or safety of Google, Google users, or the public as required or permitted by law.

Google also shares non-personal information -- such as trends about the use of its services -- publicly and with its partners.



WHICH CHOICES ARE PARENT/GUARDIAN ENTITLED TO?

First, the parent/guardian can authorise the collection and use of enrolled student data by Google. Without consent, we will not create a Google Workspace for Education account for the enrolled student, and Google will not collect or use the enrolled student's data as described in this policy.

If the parent/guardian authorises the enrolled student to use Google Workspace for Education, the parent/guardian can access or request deletion of the Google Workspace for Education account by contacting EISP S.r.l. To stop any further collection or use of the enrolled student's data, the parent/guardian may request that we use the service controls available to limit the enrolled student's access to certain features or services or terminate the enrolled student's account entirely. The parent/guardian and the enrolled student can also visit <https://myaccount.google.com> while signing in to the Google Workspace for Education account to view and manage the personal information and account settings.

WHAT THE PARENT/GUARDIAN HAS TO DO IN CASE OF MORE QUESTIONS OR WOULD LIKE TO READ FURTHER?

If the parent/guardian has questions about our use of Google's Google Workspace for Education accounts or the choices available, he/she can contact EISP S.r.l. If the parent/guardian wants to learn more about how Google collects, uses, and discloses personal information to provide services to us, he/she can review the Google Workspace [for Education Privacy Center](#), the Google Workspace [for Education Privacy Notice](#), and the [Google Privacy Policy](#).

The Core Google Workspace for Education services is provided to us under [Google's Apps for Education agreement](#) and the [Data Processing Amendment](#).