

PRIVACY POLICY

(Information pursuant to art. 13 of Reg. (EU) 679/2016, GDPR)

Dear Clients,

Below we provide you with some information that it is important to bring to your knowledge, 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 data is **The English International School of Padua S.r.l.**, responsible to you for the legitimate and correct use of your data and 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, info@eisp.it, eisp@pec.it

Data protection officer

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

Contacts	dpo@privacystudio.it - Xifram S.r.l.
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Treatments

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

Accountancy

Purpose and legal basis	Tax obligations, based on: Legal obligation.
Data categories	Personal data, Contact data, Address data, Payment data, Work data, Data relating to purchases or use of services
Storage time*	Common data: 10 years from the termination year of the last contract
Data recipients	Authorities and Public administrations with legal obligations to communication, Banks, Data Processors appointed under Art. 28 Reg. EU 2016/679 (see register of processors), other authorised data processing subjects appointed under Art. 29 Reg. EU 2016/679, and other entities for which data communication is necessary for the stated purposes of the Data Controller

Management control

Purpose and legal basis	- Internal business management control, on the basis of: Legitimate interest, Business activity
Data categories	Personal data, Contact data, Work data
Storage time*	Common data: 10 years from the year of competence

Data recipients	Banks, Data Processors appointed under Art. 28 Reg. EU 2016/679 (see register of processors), other authorised data processing subjects appointed under Art. 29 Reg. EU 2016/679, and other entities for which data communication is necessary for the stated purposes of the Data Controller
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Service Quality

Purpose and legal basis	To verify the quality of the service, based on: Legitimate interest in verifying compliance with internal procedures.
Data categories	Personal data, Contact information, Address data, Data related to purchases or use of services.
Storage time*	Common data: 10 years from the year of termination of the last contract.
Data recipients	Data Processors appointed under Article 28 of EU Regulation 2016/679 (see the register of processors), Authorised data processing entities appointed under Article 29 of EU Regulation 2016/679, and other entities for which data communication is necessary for the stated purposes of the Data Controller.

Customer Management

Purpose and legal basis	- Customer management, based on: Execution of a contract and/or pre-contractual measures. - Follow up on customer or potential customer requests and manage pre-contractual or contractual obligations, based on: Execution of a contract and/or pre-contractual measures.
Data categories	- Personal data, Contact information, Address data, Payment dates, Data related to purchases or use of services, Data related to vaccinations, if relevant; Information related to the educational path.
Storage time*	- Common data: 10 years from the year of the contract or from the cessation of the last contact.
Data recipients	- Authorities and public administrations subject to a legal obligation for communication, Banks, Data Processors appointed under Article 28 of EU Regulation 2016/679 (see the register of processors), Authorised data processing entities appointed under Article 29 of EU Regulation 2016/679, and other entities for which data communication is necessary for the stated purposes of the Data Controller.

Customer service

Purpose and legal basis	- Surveying customer satisfaction levels, based on: Execution of a contract and/or pre-contractual measures. - Providing technical assistance to customers, based on: Execution of a contract and/or pre-contractual measures. - Customer management, based on: Execution of a contract and/or pre-contractual measures.
Data categories	- Personal data, Contact information, Address data, Data related to purchases or use of services, Login and identification data.
Storage time*	- Common data: 10 years from the year of cessation of the last contract
Data recipients	- Data Processors appointed under Article 28 of EU Regulation 2016/679 (see the register of processors), Authorised data processing entities appointed under Article 29 of EU Regulation 2016/679, and other entities for which data communication is necessary for the stated purposes of the Data Controller.

Front Office

Purpose and legal basis	- Monitoring of people entering the company, based on: Legitimate interest, Protection of company assets, workers' safety, organisational and production needs - Filtering of phone calls, based on: Legitimate interest, Organisational and production needs
Data categories	Personal data, Contact data, Address data, Data relating to identification/recognition documents
Storage time*	Common data: 1 year from the year of data acquisition
Data recipients	Authorities and Public administrations with legal obligations to communication, Data Processors appointed under Art. 28 Reg. EU 2016/679 (see register of processors), other authorised data

	processing subjects appointed under Art. 29 Reg. EU 2016/679, and other entities for which data communication is necessary for the stated purposes of the Data Controller
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Marketing, Communication, and External Relations Activities

Purpose and legal basis	Marketing (market analysis and research), Sending informational and/or advertising material, based on the consent of the Data Subject**
Data categories	Personal data, Contact information, Address data, Data related to purchases or use of services.
Storage time*	Common data: Until the withdrawal of consent. Afterward, the processing will be limited to mere storage for 10 years from the year in which the consent was revoked.
Data recipients	Data Processors appointed under Article 28 of EU Regulation 2016/679 (see the register of processors), Authorised data processing entities appointed under Article 29 of EU Regulation 2016/679, and other entities for which data communication is necessary for the stated purposes of the Data Controller.

**Providing consent is always optional, and it can be revoked at any time. You can contact the Data Controller through the contact information provided above.

Sales and Pre-Sales Commercial Activities

Purpose and legal basis	- Promotional activities, based on: Execution of a contract and/or pre-contractual measures, Legitimate interest in promoting its activities. - Offering goods and services, based on: Execution of a contract and/or pre-contractual measures, Legitimate interest in offering goods and services.
Data categories	- Personal data, Contact information, Address data, Data related to purchases or use of services.
Storage time*	- Common data: 10 years from the relevant year.
Data recipients	- Authorities and public administrations subject to a legal obligation for communication, Banks, Data Processors appointed under Article 28 of EU Regulation 2016/679 (see the register of processors), Authorised data processing entities appointed under Article 29 of EU Regulation 2016/679, and other entities for which data communication is necessary for the stated purposes of the Data Controller.

Management and maintenance of IT systems

Purpose and legal basis	- Management and maintenance of the network and computer systems, based on: 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 under art. 28 Reg. EU 2016/679 (see register of responsible persons), other authorised data processing subjects appointed under Art. 29 Reg. EU 2016/679, and other entities for which data communication is necessary for the stated purposes of the Data Controller

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, based on: Legitimate interest to protect the rights and interests in court or in the preparatory stages to its possible establishment
Data categories	Data useful for the defence of the Data Controller
Storage time*	Data useful for the defence of the interests and rights of the Data Controller: data will be kept until the Data Controller has an interest in exercising his right or interest

Data recipients	Authorities and Public administrations with legal obligations to communication, Data Processors appointed under Art. 28 Reg. EU 2016/679 (see the register of processors), other authorised data processing subjects appointed under Art. 29 Reg. EU 2016/679, and other entities for which data communication is necessary for the stated purposes of the Data Controller
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Management of personal data protection requirements

Purpose and legal basis	- Data protection requirements, based on: Legal obligation
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 with legal obligations to communication, Data Processors appointed under Art. 28 Reg. EU 2016/679 (see the register of processors), other authorised data processing subjects appointed under Art. 29 Reg. EU 2016/679, and other entities for which data communication is necessary for the stated purposes of the Data Controller

* In addition to the time needed to mature prescriptive terms in relation to 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. memorization, filing, and conservation of data on servers or in the cloud) will be limited to the areas of circulation and processing of personal data within countries that are part of the European Union. There is an explicit prohibition to transfer them to non-EU countries 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, standard 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 yourself;
- 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.gdppd.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.