

PRIVACY POLICY

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

Dear Interested,

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 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 and that you can contact 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

Data is communicated by you and/or third parties such as other providers and/or collected from publicly available sources . Some of these sources are publicly accessible: Yes.

Treatments

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

Purchasing Management

Purpose and legal basis	- Purchasing activities for goods or services, based on: Execution of a contract and/or pre-contractual measures, to be specified
Data categories	Personal data, Contact data, Address data, Payment data
Storage time*	Common data: 10 years from the year of competence
Data recipients	Authorities and public administrations for which there is a legal obligation to communication, Banks, Data Processors appointed pursuant 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 holder's declared purposes

Supplier Management

Purpose and legal basis	- Establishment and management of the contractual relationship, based on: Execution of a contract and/or pre-contractual measures, Legal obligation, To be specified
Data categories	Personal data, Contact data, Address data, Payment data
Storage time*	Common data: 10 years from the termination year of the last contract

Data recipients	Authorities and public administrations for which there is a legal obligation to communication, Banks, Data Processors appointed pursuant 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 holder's declared purposes
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Accountancy

Purpose and legal basis	- Record keeping, based on: Legal obligation, To be specified - Tax obligations, based on: Legal obligation, To be specified
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 respect to which there is a legal obligation to communication, Banks, Data Processors appointed pursuant 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 holder's declared purposes

Logistics

Purpose and legal basis	- Acceptance and dispatch of documents and goods, based on: Execution of a contract and/or pre-contractual measures, to be specified
Data categories	Personal data, Contact data, Address data, Payment data
Storage time*	Common data: 10 years from the year of jurisdiction or the termination of the last contract
Data recipients	Authorities and public administrations with respect to which there is a legal obligation to communication, Banks, Data Processors appointed pursuant 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 holder's declared purposes

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 pursuant 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 holder's declared purposes

Activity planning and control

Purpose and legal basis	- Planning of the activities, based on: Legitimate interest, of the Holder in the business activity
Data categories	Personal data, Contact data, Work data
Storage time*	Common data: 10 years from the year of data acquisition
Data recipients	Data processors appointed pursuant 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 holder's declared purposes

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
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	- 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 respect to which there is a legal obligation to communication, Data Processors appointed pursuant 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 holder's declared purposes

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 in accordance with 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 communication, Data Processors appointed in accordance with 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

Defense 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 the defense of the Data Controller
Storage time*	Data useful for the defense 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 communication, Data Processors appointed in accordance with 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 legal basis	- Data protection requirements, based on: Legal obligation, To be specified
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 communication, Data Processors appointed in accordance with 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
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* 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 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.gdgd.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