

## 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, <a href="mailto:eisp@pec.it">eisp@pec.it</a> |

### Data protection officer

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

|          |  |
|----------|--|
| Contacts | <a href="mailto:dpo@privacystudio.it">dpo@privacystudio.it</a> - Xifram S.r.l. |
|----------|--|

### Data source

The data processed is disclosed by you or by third parties, such as recruitment or employment agencies, 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:

#### Staff recruitment

|                                |  |
|--------------------------------|--|
| <b>Purpose and legal basis</b> | Staff research for the company, based on: Execution of a contract and/or pre-contractual measures; Possible establishment of the contractual relationship, based on: Execution of a contract and/or pre-contractual measures and legal obligation  |
| <b>Data categories</b>         | Personal Data, Contact Data, Address Data, Identification/Recognition Document Data, Work Related Data, CV, Multimedia Content (eg. photo), any other data voluntarily provided by the individual, Data on criminal convictions and offences or related to security measures   |
| <b>Storage time*</b>           | Common data: 2 years from the year of research<br>Judicial data: 2 years from the year of research   |
| <b>Data recipients</b>         | Authorities and public administrations for which there is a legal obligation to communication, data processors appointed pursuant to art. 28 Reg. UE 2016/679 (see register of data processors), authorised to the processing pursuant to art. 29 EU Reg 2016/679, other parties for whom the communication of data is necessary for the achievement of the purposes declared by the data controller |

#### Management and maintenance of IT systems

|                                |  |
|--------------------------------|--|
| <b>Purpose and legal basis</b> | - 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 legislation requirements on system administrators   |
| <b>Data categories</b>         | Access and identification data   |
| <b>Storage time*</b>           | Common data: 2 years from the termination year of the contractual relationship; 18 months with regard to obligations concerning system administrators  |
| <b>Data recipients</b>         | Data processors appointed pursuant to art. 28 Reg. UE 2016/679 (see register of data processors), authorised to the processing pursuant to art. 29 EU Reg 2016/679, other subjects for whom the communication of data is necessary for the purpose of the purposes declared by the data controller |

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

|                                |  |
|--------------------------------|--|
| <b>Purpose and legal basis</b> | - 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   |
| <b>Data categories</b>         | Common data, Specific data, Data relating to criminal convictions and offences or related to security measures   |
| <b>Storage time*</b>           | 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  |
| <b>Data recipients</b>         | Authorities and public administrations for which there is a legal obligation to communication, data processors appointed pursuant to art. 28 Reg. UE 2016/679 (see register of data processors), authorised to the processing pursuant to art. 29 EU Reg 2016/679, other parties for whom the communication of data is necessary for the achievement of the purposes declared by the data controller |

#### **Management of personal data protection requirements**

|                                |  |
|--------------------------------|--|
| <b>Purpose and legal basis</b> | - Data protection requirements, based on: Legal obligation   |
| <b>Data categories</b>         | Personal data, Contact data, Address data  |
| <b>Storage time*</b>           | Common data: For the time strictly necessary for the implementation of the purposes  |
| <b>Data recipients</b>         | Authorities and public administrations for which there is a legal obligation to communication, data processors appointed pursuant to art. 28 Reg. UE 2016/679 (see register of data processors), authorised to the processing pursuant to art. 29 EU Reg 2016/679, other parties for whom the communication of data is necessary for the achievement of the purposes declared by 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 interested party 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;
- Regarding 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](mailto:protocollo@pec.gdpd.it).

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

### **Updates to this policy**

We reserve the right to update our Privacy Policy. The updates will be communicated and we will insert 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 03/08/2023