



THE ENGLISH INTERNATIONAL SCHOOL OF PADUA

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

The processed data are communicated by you and/or third parties, such as public authorities and bodies 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:

School activity management

Purpose and legal basis	- Organisation and conduction of school activities, based on: Execution of a contract and/or pre-contractual measures, Legal obligation
Data categories	Data relating to legal proceedings, Personal data, Contact data, Payment data, Data on the composition of the household, Data relating to identification documents, Data relating to identification codes, Address data, Evaluation data, Attendance/absence data, Access and identification data
Storage time*	Common data and Judicial data: 10 years from the cessation year of the effects of the last contact
Data recipients	Authorities and public administrations for which there is a legal obligation to communication, Data Subjects authorized for processing appointed under Art. 29 EU Reg. 2016/679, processors appointed pursuant to art. 28 Reg. EU 2016/679, Schools, institutes and certification bodies, other parties for which the communication of data is necessary for the achievement of the holder's declared purposes



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Management of educational and recreational and support activities

Purpose and legal basis	- Organisation and conduction of educational and recreational activities, based on: Execution of a contract and/or pre-contractual measures, Legal obligation - Management of cultural exchanges, based on: Execution of a contract and/or pre-contractual measures
Data categories	Personal data, Contact data, Payment data, Evaluation data, Attendance/absence data
Storage time*	Common data: 10 years from the year of cessation of the effects of the last contact
Data recipients	Authorities and public administrations with respect to which there is a legal obligation to communication, Subjects authorized for processing appointed under Art. 29 EU Reg. 2016/679, Data Processors appointed pursuant to art. 28 Reg. UE 2016/679, Schools, institutes and certification bodies, other parties for which the communication of data is necessary for the achievement of the holder's declared purposes

Students' transport management

Purpose and legal basis	- Transport of students from/to home and school, based on: Performance of a contract and/or pre-contractual measures
Data categories	Personal data, Contact data, Payment data, Address data, Attendance/absence data
Storage time*	Common data: 10 years from the cessation year of the effects of the last contact
Data recipients	Authorities and public administrations for which there is a legal obligation to communication, Subjects authorized for processing appointed under Art. 29 EU Reg. 2016/679, Data Processors appointed pursuant to art. 28 Reg. UE 2016/679, other parties for whom the communication of data is necessary for the achievement of the holder's declared purposes

School trips management

Purpose and legal basis	- Organisation and conduction of school trips, based on: Execution of a contract and/or pre-contractual measures
Data categories	Personal data, Contact data, Payment data, Identification/recognition document data, Identification codes data, Address data, Attendance/absence data
Storage time*	Common data: 10 years from the cessation year of the effects of the last contact
Data recipients	Authorities and public administrations for which there is a legal obligation to communication, Data Subjects authorized for processing appointed under Art. 29 EU Reg. 2016/679, Processors appointed pursuant to art. 28 Reg. UE 2016/679, accommodation facilities, other parties for whom the communication of data is necessary for the achievement of the holder's declared purposes

Management of IT systems and services for students

Purpose and legal basis	- Managing IT systems and services for students, based on: Execution of a contract and/or pre-contractual measures
Data categories	Personal data, Contact data, Access and identification data, Usage data, Data relating to the provision of an electronic communication service
Storage time*	Common data: for the accounts, 1 year after the last attendance of the student or after the termination of the relationship. 18 months with regard to the obligations concerning system administrators



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Data recipients	Subjects authorized for processing appointed under Art. 29 EU Reg. 2016/679, Data Processors appointed pursuant to art. 28 Reg. UE 2016/679, other parties for whom the communication of data is necessary for the achievement of the holder's declared purposes
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Management of mandatory health data (e.g., vaccinations)

Purpose and legal basis	- Comply with regulatory obligations in the social and health field, based on: Legal obligation, Public interest
Data categories	Health-related data
Storage time*	Common data and sensitive data: According to regulatory obligation
Data recipients	Authorities and public administrations for which there is a legal obligation to communication, Subjects authorized for processing appointed under Art. 29 EU Reg. 2016/679, Data Processors appointed pursuant to art. 28 Reg. UE 2016/679, other parties for whom the communication of data is necessary for the achievement of the holder's declared purposes

Students' health and safety

Purpose and legal basis	- Protect the health and safety of students and other users, based on the individuals' consent regarding the data**
Data categories	Personal data, Contact data, Health data, Address data
Storage time*	Common data and Sensitive data: Until the withdrawal of consent. Then the processing will be limited to mere storage for 10 years from the year in which the consent was revoked
Data recipients	Authorities and public administrations for which there is a legal obligation to communication, Subjects authorized for processing appointed under Art. 29 EU Reg. 2016/679, Data Processors appointed pursuant to art. 28 Reg. UE 2016/679, other parties for whom the communication of data is necessary for the achievement of the holder's declared purposes

**Consent provision is always optional and it can be revoked at any time, you can contact the Data Controller through the contact information above.

Management of school-based internships and job placement

Purpose and legal basis	- Organization of school-work alternation activities, based on: Execution of a contract and/or pre-contractual measures
Data categories	Personal data, Contact data, Address data, Data related to work/school activity
Storage time*	Common data: 10 years from the cessation year of the effects of the last contact
Data recipients	Hosting organizations, Data Processors appointed pursuant to art. 28 Reg. UE 2016/679, Subjects authorized for processing appointed under Art. 29 EU Reg. 2016/679, other parties for whom the communication of data is necessary for the achievement of the holder's declared purposes

Canteen service management

Purpose and legal basis	- Provision of canteen services, based on: execution of a contract and/or pre-contractual measures, Consent for particular categories of data
Data categories	Personal data, Contact data, Address data, Identification codes data, Health-related data, Special diets data
Storage time*	Common data and sensitive data: 10 years from the year of the user's last booking, unless there are changes in the service, unless there is a withdrawal of consent.
Data recipients	Authorities and public administrations for which there is a legal obligation to communication, Subjects authorized for processing appointed under Art. 29 EU Reg. 2016/679, Data Processors appointed pursuant to art. 28 Reg. UE 2016/679, other parties for whom the communication of data is necessary for the achievement of the holder's declared purposes



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Quality of service

Purpose and legal basis	- Verify the quality of the service on the basis of: legitimate interest of the controller to verify the compliance with internal procedures
Data categories	Personal data, Contact data, Address 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	Subjects authorized for processing appointed under Art. 29 EU Reg. 2016/679, Data Processors appointed pursuant to art. 28 Reg. UE 2016/679, other parties for whom the communication of data is necessary for the achievement of the holder's declared purposes

Customer service

Purpose and legal basis	- Assessment of customer satisfaction, based on: Execution of a contract and/or pre-contractual measures - Technical assistance to customers, based on: Execution of a contract and/or pre-contractual measures - Customer management, based on: Performance of a contract and/or pre-contractual measures
Data categories	Personal data, Contact data, Address data, Data relating to purchases or use of services, Access and identification data
Storage time*	Common data: 10 years from the termination year of the last contract
Data recipients	Subjects authorized for processing appointed under Art. 29 EU Reg. 2016/679, Data Processors appointed pursuant to art. 28 Reg. UE 2016/679, other subjects for whom the communication of data is necessary for the purposes 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 - 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 for which there is a legal obligation to communication, Subjects authorized for processing appointed under Art. 29 EU Reg. 2016/679, Data Processors appointed pursuant to art. 28 Reg. UE 2016/679, other parties for whom the communication of data is necessary for the achievement of the holder's declared purposes

Marketing, communication, and external relations activities

Purpose and legal basis	- Marketing (market analysis and investigation), Sending of informative and/or advertising material, based on the individual's consent**
Data categories	Personal data, Contact data, Address data, Data relating to purchases or use of services
Storage time*	Common data: Until the withdrawal of consent. Then the processing will be limited to mere storage for 10 years from the year in which the consent was revoked
Data recipients	Subjects authorized for processing appointed under Art. 29 EU Reg. 2016/679, Data Processors appointed pursuant to art. 28 Reg. UE 2016/679, other subjects for whom the communication of data is necessary for the purposes of the holder's declared purposes

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Customer management



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Purpose and legal basis	- Customer management, based on: Execution of a contract and/or pre-contractual measures - Follow up the customer or potential customer's requests and manage pre-contractual or contractual obligations, based on: Performance of a contract and/or pre-contractual measures
Data categories	Personal data, Contact data, Address data, Payment data, Data relating to purchases or use of services
Storage time*	Common data: 10 years from the contract year or the end of the last contact
Data recipients	Authorities and public administrations for which there is a legal obligation to communication, Banks, Subjects authorized for processing appointed under Art. 29 EU Reg. 2016/679, Data Processors appointed pursuant to art. 28 Reg. UE 2016/679, other parties for whom the communication of data is necessary for the achievement of the holder's declared purposes

Sale and business activity prior to sale

Purpose and legal basis	- Promotional activities, based on: Execution of a contract and/or pre-contractual measures, Legitimate interest, Promoting its own activities - Offering goods and services, based on: Execution of a contract and/or pre-contractual measures, Legitimate interest
Data categories	Personal data, Contact data, Address data, Data relating to purchases or use of services
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, Subjects authorized for processing appointed under Art. 29 EU Reg. 2016/679, Data Processors appointed pursuant to art. 28 Reg. UE 2016/679, other parties 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 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	Subjects authorized for processing appointed under Art. 29 EU Reg. 2016/679, Data processors appointed in accordance with art. 28 Reg. UE 2016/679, 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 of the controller in the protection of company assets and in safety of workers
Data categories	Photographic audio-video recordings
Storage time*	Common data: 24 hours
Data recipients	Authorities and public administrations for which there is a legal obligation to communication, Subjects authorized for processing appointed under Art. 29 EU Reg. 2016/679, Data processors appointed in accordance with art. 28 Reg. UE 2016/679, 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



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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's interests and rights
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, Subjects authorized for processing appointed under Art. 29 EU Reg. 2016/679, Data processors appointed in accordance with art. 28 Reg. UE 2016/679, 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
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, Subjects authorized for processing appointed under Art. 29 EU Reg. 2016/679, Data processors appointed in accordance with art. 28 Reg. UE 2016/679, other subjects for whom the communication of data is necessary for the achievement of the owner's declared purposes

* 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.). A specific information notice is available for Google Workspace for Education services.

Rights of data subjects

- 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;



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- 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 15/12/2023