

Information for students and their guardians - art. 13 of the European Regulation 679/2016 (GPRD)

Data controller for the protection of personal data

The Data Controller is the ENTE AUTONOMO INTERNATIONAL SCHOOL OF TRIESTE, having a registered address at Via Conconello 16, 34151 - Opicina (Trieste), phone: 040.211452, email: info@istrieste.org

Types of personal data collected

Personal data, collected according to law and in compliance with the principles of legality, fairness and confidentiality, are as follows:

- A) anagraphic and contact details of students and their guardians - such as name, address, telephone number (including mobile), social security number, email address, etc...;
- B) personal data of the pupil in relation to evaluations, performances and behavior within the school environment;
- C) data of the guardians and any other sponsor of the school fees, in relation to economic and judicial relationships necessary to fulfill the requested services;
- D) data of the student also sometimes related to racial and ethnic origin, religious or philosophical beliefs, political opinions, memberships to parties, trade unions or to any associations or organizations having religious, philosophical, political or trade union nature and sometimes suitable to reveal information about health or judicial history.

The sensitive data that will be processed may concern in particular the state of health of the students in relation to diet, food allergies or other types of allergies, verification of the students' eligibility to enroll in and remain enrolled at school, vaccination status, application of sanitary & preventive measures, certifications of illnesses, injuries or other emergency situations occurred at school, sport fitness certifications. Data processing may also concern the student's religious faith for the sole purpose of allowing the pupil to observe particular time schedules or whether or not to consume particular foods or drinks, compatible with the school's organizational needs;

- E) data related to customer satisfaction and feedback - such as the data collected via customer satisfaction surveys and feedback;
- F) data collected while visiting the school website - such as the data collected through the use of cookies and other data automatically collected to allow access to the school websites, or information provided while visiting the school website (for example, through contact forms, etc...).

Method of treatment

Personal data are collected verbally, in paper or electronic format and are processed for the sole purpose of meeting the aforementioned scopes. Data are collected from:

- the students or their guardians or other delegated subjects, from the lenders of tuition fees at the time of enrollment and, subsequently, if changes or additions are necessary;
- the school website;
- sources publicly accessible (public bodies, private companies, search engines, etc...).

Purposes of data processing

Data processing has the following purposes:

- to provide the correct educational and related services,
- to fulfill legal, fiscal and accounting obligations in order to comply with the applicable legislation.

Legal basis of data processing

The school has the legal right to process the personal data of the students and their guardians as such processing activities:

- are required to execute the contract entered with the school; or
- are required to implement any pre-contractual measures adopted upon request of the students or their guardians; or
- are required by the school to fulfill a legal obligation; or
- are required, according to a legitimate interest of the school, to improve the services offered to customers; or
- have been freely authorized by the students and their guardians.

Recipients of the data collected

The data collected by the school may be communicated as outlined below:

- student data may be communicated to school employees, health & safety bodies, public educational institutions and other bodies authorized by law, as well as to insurance companies, that are also obligated to professional confidentiality;
- student data may be transmitted, processed and filed, also outside the European Union, in connection with the "main services" of the Google platform *Workspace for Education* which is used by the school to provide didactic and online evaluation services, videoconferences & mailing services, filing of photos and documents, processing of texts, slides, electronic worksheets, calendar sharing, etc., subject to the activation of a dedicated personal account whose services fall under the Responsibility of Google as external Data Controller;
- student data may, furthermore, be transmitted, processed and filed, also outside the European Union, in connection with the "additional services" of the Google platform *Workspace for Education*, such as, for example, Translator, Youtube, etc., that fall under the Responsibility of Google as external Data Controller;
- the telephone numbers of family members related to students that belong to the same class will be communicated to all parents and teachers in order to share information regarding didactic activities and to facilitate the establishment of social relationships; the same will be done in the event of school trips organized by the school or by third party bodies or organizations duly authorized by the latter;
- pupils and parents could be featured in photographs or videos taken, during school parties and shows, by the relatives of other pupils and such images could be shared at a social level. They could as well be featured in photographs and videos taken, during school parties and shows, by subjects authorized by the school for the purpose of including them in the school yearbook or in videos recorded of such events, provided that the purchase of such media products is reserved to students, their relatives and school staff and any subsequent transfer is prohibited;
- students' intermediate grades may be disclosed within the class to which they belong and their final grades may also be displayed on the official school bulletin board as provided by the current legislation;
- students' grades may also be communicated to bodies or institutions of verified reliability and professionalism for the purpose of facilitating the students' orientation, training, and professional integration;
- to Public Bodies and Administrations responsible for verifying and checking compliance to the obligations referred to in the aforementioned purposes (e.g. Public Education, Tax Agency, Law Enforcement and Judicial Authorities, Labour Inspectorate, Social Welfare institutions, Social Security institutions, Governmental Employment Agencies, etc.);
- to Private Bodies whose services are in pursuit the aforementioned purposes (e.g. banking and insurance institutions, trade unions and bilateral organizations, trade associations and taxpayer assistance centers);
- to external school consultants;
- to suppliers providing IT and telematics services to the school.

The above-mentioned data may be handled within Italy or abroad, also outside the European Union.

Except for the cases specifically listed above, the collected data will not be disclosed or communicated to third parties.

Data retention period

Your personal data, which are processed for the above-mentioned purposes, shall be kept for the duration of the contract and, subsequently, for the time required by law in order to serve any civil, fiscal or other purposes provided by legislation, or even beyond, where conservation is necessary to protect the rights of any of the parties concerned.

Profiling and disclosure of data

Your personal data will not be divulged, neither will it be subject to any fully automated decision-making process, including profiling.

Particular categories of personal data

Under Articles 9 and 10 of the GDPR, these categories of data may be processed only after receiving your free and explicit consent, expressed in writing at the bottom of this notice, or pursuant to article 9, paragraph 2, letter f) and g) of the GDPR.

Consequences of failure to communicate personal data

Refusal to provide the necessary data by the students or their guardians may impair their possibility to correctly access the school services. Full use of digital tools is an essential element of the proposed curriculum.

Rights relating to personal data

According to the GDPR, concerned data subjects can at any time access their personal data, request rectification, erasure, restriction of processing or portability. They also have the right to oppose specific processing activities for legitimate reasons. They may withdraw the consent given without prejudice to the

lawfulness of the treatment based on the consent given before the withdrawal. Furthermore, data subjects also have the right to lodge a complaint with the supervisory authority identified by Italian law.

Expression of Consent

ADULT STUDENT (IF MINOR, HIS/HER FIRST PARENT*)

Having read and understood the above, I hereby declare for myself and for the minor that I represent that I have received adequate information regarding the processing of personal data and my rights in this regard.

I, the undersigned, therefore authorize the data controller to perform the common data processing activities described above as my consent represents the lawful basis of the processing and for this reason:

I give my consent I deny consent

I hereby agree to allow the data controller to perform the processing of particular data as my consent represents the lawful basis of the processing and for this reason:

I give my consent I deny consent

Place and date _____ SIGNATURE _____

IF MINOR STUDENT, (WHERE APPLICABLE) SECOND PARENT*

Having read and understood the above, I hereby declare for myself and for the minor that I represent that I have received adequate information regarding the processing of personal data and my rights in this regard.

I, the undersigned, therefore authorize the data controller to perform the common data processing activities described above as my consent represents the lawful basis of the processing and for this reason:

I give my consent I deny consent

I hereby agree to allow the data controller to perform the processing of particular data as my consent represents the lawful basis of the processing and for this reason:

I give my consent I deny consent

Place and date _____ SIGNATURE _____

*OR ANOTHER GUARDIAN