



THE INTERNATIONAL SCHOOL IN GENOA

SINCE 1966

NOTICE ON THE PROCESSING OF PERSONAL DATA

FOR STUDENTS AND THEIR PARENTS/GUARDIANS

(Information pursuant to Articles 13 and 14 of Reg. (EU) 679/2016, so-called "GDPR")

Below we provide you with some information that we need to bring to your attention, not only to comply with legal obligations, but also because transparency and fairness towards data subjects is a fundamental part of our commitment.

This policy is intended for students and their parents or guardians who request information prior to enrollment or admission.

Data Controller

The Data Controller for your personal data is **The International School In Genoa** (VAT IT03766040103), with registered office in Via Romana della Castagna 11a - 16148, Genoa (GE) - Italy, responsible to you for the legitimate and correct use of your personal data and which you can contact for any information or request at the following addresses: +39010386528, privacy@isgenoa.it, isgenoa@pec.it

Data Protection Officer

The Data Protection Officer (DPO) can be contacted at the following addresses: dpo@isgenoa.it

Data source

The data processed are communicated by you and/or third parties, such as reference figures of the previous school of attendance. Such sources are not publicly accessible..

Processing activities

Your personal data are collected and processed, with automated and non-automated methods, as specified below.

Management of pre-registration requests

Purpose and legal basis	- Follow up on the requests of potential pupils/families and manage pre-contractual obligations, based on the execution of a contract and/or pre-contractual measures, Consent for special categories of data (Derogation: Art. 9 GDPR c. 2 letter a). - To propose services that are the same or similar to those requested, on the basis of the school's legitimate interest in promoting the services and reaching the contract.
Data categories	Personal data, Contact data, Address data, Language, Access and identification data, Data provided voluntarily by the user, Contact preferences, Reasons for the request
Storage time*	Up to two years from the year of acquisition of the data or from the year of the last expression of interest by the user
Recipients of the data	Data processors appointed pursuant to Article 28 of EU Reg. 2016/679 (see register of data processors), Persons authorised to process data appointed pursuant to Article 29 of EU Reg. 2016/679, other subjects for whom the communication of data is necessary for the purpose of carrying out the purposes declared by the data controller

Admissions management

Purpose and legal basis	- Evaluation of applications for admission and communication with the families of candidate students, on the basis of the execution of a contract and/or pre-contractual measures, consent for special categories of data (Derogation: Art. 9 GDPR c. 2 letter a).
Data categories	Personal Data, Contact Data, Language, School Performance, Portfolio, Test Results (e.g. MAP, IOWA, WrAP, ERB, etc.), Cover Letters, Evaluations, Logo-pedagogical, Psychoeducational or Specific Learning Needs Assessment Reports, Specific Learning Needs, including Individual Education Plans (IEPs)
Storage time*	10 years from the year of the request, unless consent is withdrawn
Recipients of the data	Data processors appointed pursuant to Article 28 of EU Reg. 2016/679 (see register of data processors), Persons authorised to process data appointed pursuant to Article 29 of EU Reg. 2016/679, other subjects for whom the communication of data is necessary for the purpose of carrying out the purposes declared by the data controller

* In addition to the time necessary for the statute of limitations to accrue in relation to mutual rights and the time of storage of backups.

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www.isgenoa.it | ADMISSION info@isgenoa.it | ACCOUNTING business@isgenoa.it | SECRETARY secretary@isgenoa.it
TAX ID 80032730105 | VAT NUMBER 03766040103 | REGISTRATION ORDER NUMBER 566 Liguria Region

Recognized Association Decree Dir N.2577/2007 Liguria Region



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In addition to the above, as part of the activities functional to the good management of the organization, your personal data will also be processed by internal or external personnel duly authorized for:

- 1) the management and maintenance of the network and IT systems, when the processing takes place even through partially automated methods (therefore, for example, when the data transit through the computer systems of The International School In Genoa), on the basis of the legitimate interest in the protection of the same and for the obligations inherent in the security of information; the data are stored in accordance with the security implementations and the provisions for the main reference processing among those described above;
- 2) manage compliance activities, including personal data protection obligations, as required by law, in accordance with the retention times provided for the main processing of reference;
- 3) to prevent and detect abuses and to defend the rights and interests of the Data Controller, storing them until the expiry of the limitation periods, except in the event of litigation (in this case, the data will be stored until the subject matter of the dispute is definitively ceased), on the basis of the Data Controller's legitimate interest in the protection of its rights and interests.

Automated process

The processing is not based on automated decision-making.

Provision of data

Except for any purposes based on consent, the provision of your data is a necessary requirement: failure to provide the data indicated as mandatory could result in legal and contractual consequences. Therefore, if you do not provide it, you may not obtain the expected result or only partially obtain it.

Data transfer outside the EU

The processing of personal data (e.g. storage, archiving and storage of data on its servers or in the cloud) will be limited to the areas of circulation and processing of personal data in countries belonging to the European Union, with an express prohibition to transfer them to non-EU countries that do not guarantee (or in the absence of) an adequate level of protection, or, in the absence of protection tools provided for by EU Regulation 2016/679 (third country deemed adequate by the European Commission, group BCRs, standard contractual clauses, consent of the data subjects, etc.).

Rights of the data subject

- You have the right, according to the provisions of art. 15 et seq. of EU Reg. 2016/679 to request from the Data Controller access to your personal data, as well as their rectification and erasure;
- You also have the right to request data portability or restriction of processing;
- You have the right, on grounds relating to your particular situation, to object to processing of personal data concerning you based on legitimate interest;
- You have the right to view the essential contents of any joint controllership agreements signed;
- For processing based on consent, you have the right at any time to withdraw consent, without prejudice to the lawfulness of the processing based on the consent given before its withdrawal;
- You may also lodge a complaint with the Italian Data Protection Authority, located in Piazza Venezia 11, 00187 – Rome – protocollo@pec.gdpd.it.

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

Changes to this policy

We reserve the right to update our Privacy Policy. We will notify you of changes as we see fit, and we will update the date in this Privacy Policy. Therefore, we recommend that you periodically consult our Privacy Policy, also requesting a copy from the Data Controller.

Last update: 10/10/2024

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