**NOTICE ON THE PROCESSING OF PERSONAL DATA** *FOR STUDENTS AND FAMILIES*

*(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 aimed at students and their families.**

**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 the student or by parents/guardians or, exceptionally, by third parties such as authorities and public bodies. Such sources are not publicly accessible.

**Processing activities**

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

**School activity management**

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| Purpose and legal basis | - Organization and performance of school activities, based on the execution of a contract and/or pre-contractual measures, legal obligation |
| Data categories | Personal data, Contact data, Payment data, Data on the composition of the family unit, Data relating to identification/identification documents, Data relating to identification codes, Address data, Evaluation data, Attendance/absence data |
| Storage time\* | 10 years from the year of termination of the effects of the last contact |
| Recipients of the data | Authorities and public administrations with respect to which there is a legal obligation to communicate, Data processors appointed pursuant to Article 28 of EU Reg. 2016/679 (see register of data processors), Schools, institutes and certification bodies, 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 |

**Management of educational, recreational and support activities**

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| Purpose and legal basis | - Management of cultural exchanges, based on the execution of a contract and/or pre-contractual measures  - Organization and implementation of educational, recreational and support activities, based on a legal obligation, execution of a contract and/or pre-contractual measures |
| Data categories | Personal data, Contact data, Payment data, Evaluation data, Attendance/absence data |
| Storage time\* | 10 years from the year of termination of the last contract |
| Recipients of the data | Authorities and public administrations with respect to which there is a legal obligation to communicate, Data processors appointed pursuant to Article 28 of EU Reg. 2016/679 (see register of data processors), Schools, institutes and certification bodies, 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 |

**Pupil health and safety**

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| Purpose and legal basis | - Protect the health and safety of the pupil and other users, based on the public interest in the protection of the minor, a legal obligation  - Administer medication, based on the consent of the Data Subject\*\* |
| Data categories | Personal data, Contact data, Address data |
| Storage time\* | Common data: The data will be stored for up to 10 years from the year of termination of the last contract |
| Recipients of the data | Authorities and public administrations with respect to which there is a legal obligation to communicate, Data processors appointed pursuant to Article 28 of EU Reg. 2016/679 (see register of data processors), Persons authorized 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 |

\*\*The provision of consent is always optional and can be revoked at any time, you can contact the Data Controller using the contact information above.

**Management of educational outings**

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| Purpose and legal basis | - Organization and conduct of educational outings, based on the execution of a contract and/or pre-contractual measures |
| Data categories | Personal data, Contact data, Payment data, Data relating to identification/identification documents, Data relating to identification codes, Address data, Attendance/absence data |
| Storage time\* | 10 years from the year of termination of the effects of the last contact |
| Recipients of the data | Authorities and public administrations with respect to which there is a legal obligation to communicate, Prefecture and Police Headquarters, Data Processors appointed pursuant to Article 28 of EU Reg. 2016/679 (see register of data processors), Persons authorized to process data appointed pursuant to Article 29 of EU Reg. 2016/679, Accommodation facilities, other subjects for whom the communication of data is necessary for the purpose of carrying out the purposes declared by the data controller |

**Management of mandatory health data (e.g. vaccinations)**

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| Purpose and legal basis | - To comply with regulatory obligations in social and health matters, based on a legal obligation, public interest (Derogation: Art. 9 GDPR letter (i) Public interest in the field of public health) |
| Data categories | Common Data, Special Data |
| Storage time\* | Based on the regulatory obligation |
| Recipients of the data | Authorities and public administrations with respect to which there is a legal obligation to communicate, Data processors appointed pursuant to Article 28 of EU Reg. 2016/679 (see register of data processors), Persons authorized 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 |

**Pupil transport management**

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| Purpose and legal basis | - Transport of pupils for the home-school journey, based on the execution of a contract and/or pre-contractual measures |
| Data categories | Personal data, Contact data, Payment data, Address data, Attendance/absence data |
| Storage time\* | 10 years from the year of termination of the effects of the last contact |
| Recipients of the data | Authorities and public administrations with respect to which there is a legal obligation to communicate, Data processors appointed pursuant to Article 28 of EU Reg. 2016/679 (see register of data processors), Persons authorized 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 |

**Management of IT systems and services for pupils**

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| Purpose and legal basis | - Manage IT systems and services for pupils, based on the 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, Data relating to identification codes, Evaluation data, Address data, Data relating to the devices used, Multimedia content (e.g. photos and videos) |
| Storage time\* | 1 year from the year following the year of the student's last attendance or from the year in which the effects of the relationship ended, for accounts 18 months with regard to the obligations regarding system administrators |
| Recipients of the data | Data processors appointed pursuant to Article 28 of EU Reg. 2016/679 (see register of data processors), Persons authorized to process data appointed pursuant to Article 29 of EU Regulation 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 |

**Canteen service management**

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| Purpose and legal basis | - Provision of the canteen service, on the basis of the execution of a contract and/or pre-contractual measures, consent for special categories of data. |
| Data categories | Personal data, Contact data, Address data, Data relating to identification codes, Data relating to special diets |
| Storage time\* | Common data: 10 years from the year of termination of the effects of the contract  Special data: Until the termination of the contract relating to the canteen service |
| Recipients of the data | Data processors appointed pursuant to Article 28 of EU Reg. 2016/679 (see register of data processors), Persons authorized 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 |

**Creation and publication-dissemination of multimedia content**

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| Purpose and legal basis | - Promote the activities of the Data Controller, based on the consent of the Data Subject. \*\* |
| Data categories | Personal data, Contact data, Multimedia content |
| Storage time\* | The data will be stored, unless disseminated, until consent is revoked or an explicit request for cancellation is accepted. In any case, if the purpose for which they were acquired no longer exists, the data will be deleted. |
| Recipients of the data | Data processors appointed pursuant to Article 28 of EU Reg. 2016/679 (see register of data processors), Persons authorized 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 |

\*\*The provision of consent is always optional and can be revoked at any time, you can contact the Data Controller using the contact information above.

\* 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.

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 cancellation or 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: 19/12/2024*