



THE INTERNATIONAL SCHOOL IN GENOA

SINCE 1966

INFORMATION ON THE PROCESSING OF PERSONAL DATA

FOR PUPILS AND FAMILIES

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

Below we provide you with some information that needs to be brought 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 business.

This policy is aimed at students and their families.

Data Controller

The Data Controller of 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 is communicated by the student or by parents/guardians or, exceptionally, by third parties such as authorities and public bodies. These sources are not publicly accessible.

Treatments

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

School activity management

Purpose and legal basis	- Organization and performance of school activities, based on the execution of a contract and/or pre-contractual measures and legal obligations
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 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

Management of educational, recreational and support activities

Purpose and legal basis	- Organization and implementation of educational, recreational and support activities, including the management of extracurricular activities, the management of tests and exams organized by parties outside the school and support for applications to other institutes, colleges or universities, on the basis of the execution of a contract and/or pre-contractual measures, legal obligations or, where required (e.g. for special data), on the basis of the consent of the Data Subject**
Data categories	Personal data, Contact data, Payment data, Evaluation data, Attendance/absence data, Data relating to school performance, Data relating to health or indirect data on health (e.g. special needs)
Storage time*	Common data: 10 years from the year of termination of the last contract Special data: until the withdrawal of consent
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 authorised to process data appointed pursuant to Article 29 of EU Reg. 2016/679, external professionals (e.g. counsellors), schools, institutes, certification bodies and 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 via the contact information above.

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Pupil health and safety

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 child and legal obligations - Administer medication, based on the consent of the Data Subject**
Data categories	Master 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 Special data: until the withdrawal of consent
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 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

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Management of educational outings or external events

Purpose and legal basis	- Organisation and conduct of educational outings, cultural exchanges or other events outside the school, 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 authorised to process data appointed pursuant to Article 29 of EU Reg. 2016/679, carriers, accommodation facilities, schools, institutes, certification bodies, event organisers or other parties for whom the communication of data is necessary for the purposes of carrying out the data of the Data Controller's stated purposes

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

Purpose and legal basis	- To comply with regulatory obligations in social and health matters, based on a legal obligation and the public interest, including for special data
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 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 IT systems and services for pupils

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*	Common data: 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 cease
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 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

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. - Management of the special diet, based on the consent of the Data Subject**
Data categories	Personal data, Contact data, Address data, Data relating to identification codes, Data relating to special diets

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Storage time*	Common data: 10 years from the year of termination of the effects of the contract Special data: until the withdrawal of consent
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

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Creation and publication-dissemination of multimedia content

Purpose and legal basis	- Promote the activities of the Data Controller, based on the consent of the Data Subject.**
Data categories	Master 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 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

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School Counseling

Purpose and legal basis	- Management of requests for access to the service on the basis of the execution of the contract and/or pre-contractual measures; - Communication of personal data to the professional to allow the provision of the requested service on the basis of the consent of the Data Subject.
Data categories	Personal data, data relating to school performance, specific learning needs, including Individual Educational Plans (IEPs)
Storage time*	10 years from the year of disbursement of the activity
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 Regulation 2016/679, External professionals authorised to carry out their profession (e.g. school psychologist), other subjects for whom the communication of data is necessary for the purpose of carrying out the purposes declared by the data controller

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Alumni Programme

Purpose and legal basis	- Management of the Alumni community based on the execution of a contract and/or pre-contractual measures
Data categories	Personal data, contact data, data relating to the educational background, data relating to work activity
Storage time*	10 years from the year in which the last registration ceases to apply
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 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

* 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

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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, model contractual clauses, consent of the data subjects, etc.).

Due to the specific nature of the School's activities, the transfer of data outside the EU may take place, in compliance with the above, to schools, institutes, organizations based outside the European Union, such as, for example, test and examination organizations (e.g. IBO), colleges/universities, organizers of international events (e.g. MUN).

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 oblivion;
- 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.gdpr.it.

To exercise your rights or to request additional information, you can contact the Data Controller via 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 updated: 16/04/2026

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