



THE INTERNATIONAL SCHOOL IN GENOA

SINCE 1966

NOTICE ON THE PROCESSING OF PERSONAL DATA

FOR CUSTOMERS AND POTENTIAL CUSTOMERS

(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 information is aimed at customers and potential customers, understood as those who have a contractual relationship with The International School In Genoa.

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 processed data are communicated by you and/or by third parties, such as authorities and public bodies (e.g. Chamber of Commerce) and/or collected from publicly accessible sources.

Processing activities

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

Organizational-administrative management

Purpose and legal basis	- Follow up on the requests of the Pupils/families and manage contractual or pre-contractual obligations, based on the execution 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, Data provided voluntarily, Access and identification data
Storage time*	10 years from the year in which the effects of the last contact ceased, unless consent is withdrawn
Recipients of the data	Authorities and public administrations with respect to which there is a legal obligation to communicate, Banks, 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

Accounting

Purpose and legal basis	- Keeping of accounting records, based on legal obligation (tax compliance)
Data categories	Personal data, Contact data, Address data, Payment data, Data relating to work activities, Data relating to purchases or use of services
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, Banks, 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

Planning and control activities

Purpose and legal basis	- Planning of activities, based on the legitimate interest of the Data Controller in the exercise of the business activity
Data categories	Personal data, Contact data, Activity data
Storage time*	10 years from the year of data acquisition
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.

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	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 control

Purpose and legal basis	- Internal management control, based on the legitimate interest in carrying out the business activity
Data categories	Personal data, Contact data, Data relating to work activity, data relating to the use of services
Storage time*	10 years from the year of competence
Recipients of the data	Banks, 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

Front office

Purpose and legal basis	- Filtering of phone calls, based on legitimate interest for organizational needs
Data categories	Personal data, Contact data, Address data
Storage time*	For phone calls, there is no provision for the storage of the data, except as provided for in the telephone records.
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

Marketing, communication and external relations activities

Purpose and legal basis	- Marketing (market analysis and surveys), Sending of information and/or advertising material, based on the consent of the Data Subject **
Data categories	Personal data, Contact data, Address data, data relating to the use of services
Storage time*	Until consent is withdrawn. Then the processing will be limited to mere storage for 10 years from the year in which the consent was withdrawn
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.

Quality of service

Purpose and legal basis	- Verify the quality of the service, based on the legitimate interest in verifying compliance with internal procedures
Data categories	Personal data, Contact data, Address data, Data relating to purchases or use of services
Storage time*	10 years from the year of termination of the last contract
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

* 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;

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- 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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