

## INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA – MULTIMEDIA CONTENTS

*(art. 13 and art. 14 of Reg. (UE) 679/2016, GDPR and D.lgs 196/2003 as subsequently amended)*

Dear,

below we provide you with information that you need to be aware of, not only to comply with legal obligations but also because transparency and fairness towards data subjects are fundamental aspects of our activity.

### Who is the Data Controller?

The Data Controller of your personal data, responsible towards you for the lawful and correct use of your data, is **The English International School of Padua S.r.l.** You can contact them for any information or request at the following:

VAT/Tax ID	IT00217240282 / IT00217240282
Address	Via Forcellini 168 - 35128, Padova (PD) - Italia
Contact details	049 8022503, info@eisp.it, eisp@pec.it

### Who is the Data Protection Officer?

The Data Controller has appointed a Data Protection Officer (DPO) who can be contacted at the following contact details:

Contact details	dpo@privacystudio.it - Xifram S.r.l.
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### Where is the data collected?

Data is collected through the signing of releases and, in case of consent and authorization, through the taking of photos and videos. Some of these sources are publicly accessible: No.

### Is there an obligation to provide data?

Except for purposes based on consent, providing your data is a necessary requirement: failure to provide data indicated as mandatory could have legal and contractual consequences, while failure to provide data indicated as optional could prevent the processing or result in partial processing. Therefore, if you fail to provide it, you might not achieve the expected result or only achieve it partially.

### What purposes are the data collected and processed for?

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The Data Controller collects and processes your personal data through automated, semi-automated, and non-automated means for purposes related to the collection and subsequent use of multimedia content (e.g., photos and videos, produced graphic materials), mainly based on the consent given by the adult subject or, in the case of minors, by their parental guardians. The [table below](#) details data processing activities with information about purposes, legal basis, data types, specific recipients, and deletion terms.

### **Are there automated processes?**

The processing is not based on automated decision-making.

### **Who are the data communicated to?**

In the context of processing activities, your data may be communicated to:

- Authorized individuals, as specified in the specific registry maintained by the Controller, thus employees and other internal subjects
- External subjects processing data on behalf of the Controller, duly instructed and bound by data processor appointment contracts (as identified in the specific registry maintained by the Controller)
- Public authorities upon their request or due to communication obligations incumbent on the Controller
- Other subjects for whom data communication is necessary for the purposes declared by the Controller, as specified for each processing in the table below.

### **How is the data stored?**

Your personal data is stored securely in accordance with identified deletion terms outlined below. However, consider that data may be stored for the time necessary to mature the prescriptive terms related to mutual rights and the time of backup retention.

### **Is the data transferred?**

The processing of personal data (e.g., storage, archiving, and conservation of data on its servers or in the cloud) is confined within the data circulation and processing scopes of the European Union countries, with an explicit prohibition of transferring them to non-EU countries that do not guarantee (or in the absence of) an adequate level of protection, or, in the absence of protective tools provided by EU Regulation 2016/679 (Third country deemed adequate by the European Commission, group BCR, model contractual clauses, consent of the data subjects, etc.). You can request more information by contacting the Controller.

### **What rights can be exercised?**

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You have the right to request from the Data Controller access to your personal data and the rectification, deletion, and portability of the same, or the restriction of processing concerning you, or to object to their processing.

If you have given consent for one or more specific purposes, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based on consent given before its withdrawal.

You also have the right to lodge a complaint with the following Supervisory Authority: Data Protection Authority, located at Piazza Venezia 11, 00187 – Rome – [protocollo@pec.gdgd.it](mailto:protocollo@pec.gdgd.it).

To exercise your rights or for additional information, you can contact the Controller using the contact information provided above.

### Can the information in this notice change?

The Data Controller may update this personal data notice in accordance with applicable laws. Any changes will be communicated appropriately, and the update date will always be visible in the notice. It is recommended to regularly check the notice and, if necessary, to request an updated copy from the Data Controller.

**Table A**

### What are the specific data processing activities conducted?

Processing activity	Creation and Publication-Distribution of Multimedia Content
Purpose and legal basis	Educational use and internal publications of EISP S.r.l. (yearbooks, school newspapers, presentations, class websites), Publication on the website <a href="http://www.eisp.it">www.eisp.it</a> , Publication on social media (e.g., Facebook/Instagram) used by the school, Use in promotional material (e.g., pamphlets, brochures, presentations), based on the consent of the Data Subject**
Data categories	Personal details, Contact detail, Multimedia content, photos and videos
Data recipients	Other schools or organizations involved in events and initiatives, Data processors appointed under Article 28 of EU Regulation 2016/679 (see the register of data processors), Authorized data processing subjects appointed under Article 29 of EU Regulation 2016/679, Other subjects for whom data communication is necessary for the purposes declared by the data controller
Storage time	Common Data: The data will be retained, except for dissemination, until consent is withdrawn or an explicit request for deletion is granted. In any case, once the purpose for which they were collected is no longer applicable, the data will be deleted.

Processing activity	Management of personal data protection requirements
Purpose and legal	Data protection requirements, based on: Legal obligation

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basis	
Data categories	Personal data, Contact data, Address data
Data recipients	Data processors appointed under Article 28 of EU Regulation 2016/679 (see the register of data processors), Authorized data processing subjects appointed under Article 29 of EU Regulation 2016/679, Other subjects for whom data communication is necessary for the purposes declared by the data controller
Storage time	Common data: For the time strictly necessary for the implementation of the purposes

Last update: 10/05/2024