



Disclosure regarding personal data processing connected to the activity of teaching and managing relations with the Families (arts. 13-14 Reg. EU 2016/679)

PREAMBLE

The International School of Florence has always considered its primary duty to guarantee the privacy of its pupils and their families, intending by this the fairness, protection and security of personal data processing.

This being stated, it is not only to fulfil the obligations imposed by the law as regards personal data protection that we have made available this document and specific notices in which those who already have dealings with ISF can recognise our policies and those who approach us for the first time will have the opportunity of appreciating its transparency.

In this document ISF intends to provide a framework, which is as complete as possible, on processing the personal data, performed as a consequence of filling out the APPLICATION FORM and for the subsequent management of the academic and administrative fiscal activities.

Considering the vastness of the subject and the different processing areas, in order to make its reading and understanding easier, the document has been divided into various paragraphs, some of which refer to different processing environments, always, however, related to the management of the pupil / child / student, who remains the central figure for ISF:

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For the sake of completeness of information, we remind you that *processing personal data* means any operation (for example: collection, storage, processing, sharing/communicating, analysis, dissemination, backup etc.) carried out with the information regarding the natural persons that this document is targeted at (pupils, family/cohabitants of the pupils, other subjects who have relations with the pupils), which ISF comes into contact with in relation to their own activities, to the services rendered and to the connected contractual, legal and administrative fulfilments.



1.DATA CONTROLLER

The data controller described on this document, that is the subject who *determines the purpose and the means* is **American Schools Abroad, Inc.** - Tax Code 80028490482 - VAT reg. no. IT04029390483 - represented in Italy by the Person Responsible and Legal Representative of the stable organisation calling itself "**International School of Florence**" - Villa Le Tavernule - via del Carota 23/25 Bagno a Ripoli (FI) 50012 - Italy - VAT reg. no.: 04029390483 - email: americanschoolsabroad@pec.it - telephone: 055 200 1515 (hereafter simply ISF or "DATA CONTROLLER").

"International School of Florence" has voluntarily appointed a Data Protection Officer, who is responsible for supervising the respect of the laws regarding the protection of personal data and whose contact data is: dpo@isfitaly.org

2.DATA PROCESSING CONNECTED TO THE ACADEMIC ACTIVITIES AND TO THE ADMISSION PROCESS

2.1 WHAT DATA IS PROCESSED

The school has the duty to promote the development of the children from all viewpoints, both by offering the best learning opportunities and by assisting them and protecting them in all the aspects of their school life and growth. In order for this to be carried out, it is essential to know and correctly manage a large amount of information regarding both the student and the context of his or her family and social life. It would be complicated to provide an exhaustive list, also due to the fact that the information collected may vary in relation to the needs of each student, it is, therefore more simple to list the information by category in the following table:

Data category	Examples of typical data
Student characteristics	Nationality, language, gender Name, date of birth, previous school details, transcripts, references
Student assessment	Teacher reports, homework assignments, external examination results, IB Diploma, SAT if appropriate
Personal identifiers authentication	Unique pupil number, Security badges
Attendance	Sessions attended, number of absences and reason for absence
Behaviour	Incidents, exclusions ASSESSMENTS OF THE TEACHING STAFF
Optional services i.e. hot lunch	Dietary requirements, food allergies etc.
Field trips and activities	Passport information (overseas trips)
Medical information	Doctor's report, vaccinations, allergies, individual health plans
Safeguarding	Child protection referral information
Special educational needs	Assessment information, specialist reports
managing company equipment	audit logs, access logs, data deriving from the use of equipment made available to the student
requests and particular needs of the student	Need for support and assistance, motor skills troubles with needs to removal of potential architectural barriers, allergies etc.
Parent contact information	Email, mobile phone, emergency contact details profession and hours of availability, plus other data communicated by them in relation to the teaching activity and assistance to the student
Family information	other information provided by the data subject, having their free disposal, regarding other family members, companions, or other subjects who have a role considered relevant for the training, the safety and the assistance of the student

Amongst this information there is also a lot of personal data to which the regulation and ISF reserve particular protection, which is *"personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or the sex life or sexual orientation (art. 9 (1) of EU Reg. 2016/679.* This data can be found amongst: *Student characteristics, Behaviour, Optional services eg hot lunch, Medical information, Safeguarding, Special educational needs, requests and particular needs of the student.*

As regards these categories of information, always subject to even higher levels of protection and confidentiality, particular attention is paid to acquiring only the data and to exclusively carrying out the processing necessary to satisfy



the requests of the students and of the families and only if they are pertinent and necessary in relation to the purposes indicated below. Furthermore, the presence of this data assumes the acquisition of consent that is requested in the admission stage.

2.2 DATA ORIGIN

With the exception of the data concerning the academic activities and school life, which, obviously originate during the course of the activities themselves within the ISF, the data:

- a) come from the data subject him or herself or from the person exercising parental responsibility, even through third party authorised subjects, even by filling in the forms provided by the school;
- b) can be acquired, even after enrolment, from the schools previously attended by the student;
- c) come from public registers, lists, deeds or documents, which anyone might know;
- d) originate during the course of any interviews in which the data subjects participate and during the course of the activities performed and are acquired, where deemed necessary, in relation to the assistance to the student.

2.3 PURPOSES OF PROCESSING

The personal data collected, concerning the students and their relatives-guardians, are necessary for the school to be able to achieve the established educative objectives and to fulfil legal and contractual obligations, as well as to favour relationships and socialisation between the students and the families.

Also regarding this subject, the detailed purposes are many and vary according to the particular needs of each student. In more detail, the processing carried out on the personal data has the following purposes:

- a. to satisfy the requests of the data subjects and preliminary assessments aimed at admission to the courses and assessment of the envisaged and necessary requirements;
- b. Organisation and effective management of the academic activities aimed at:
 - > offering the pupil/student the most effective educational plan;
 - > constantly supporting the students' learning;
 - > supporting and assisting the pupils regarding all aspects of school life and personal and social growth;
 - > monitoring the progress and the learning level of the pupils;for these purposes, audio-video recordings may be made during the course of the academic activities that:
 - > will be used to support the teaching activities, allowing the students to have useful feedback and the teachers to improve their teaching;
 - > the visiting accreditation bodies must be shown: **the records of the presentations of the students must NECESSARILY be presented to the certifying bodies (IB, PYP, CIS, MSA, MIUR etc.) to guarantee the international recognition of the Diploma;**
- c. actively involving the parents and guardians in the pupil's training, constantly referring on their progress and promoting the necessary exchange of information
- d. guaranteeing the safety of the pupils, even sharing information on the health or other particular conditions that must be known by the personnel assigned to follow the pupil him or herself
- e. respecting the standards of the accreditation authorities, for the purposes of the international recognition of academic qualifications
- f. guaranteeing the pupil acknowledgement of his or her rights, also from other public subjects, for example by making information, regarding particular conditions that can give access to facilitations on methods and times in carrying out exams and tests, available to Public Authorities or Certification Bodies
- g. fulfilling contractual obligations, fulfilling community laws, standards and regulations; fulfilling orders given by Judicial Authorities, financial ones, from insurance institutions
- h. organising curricular (also including the CAS program) and extracurricular activities (field trips, ECA program, sport activities etc.) with the possibility of communicating data, even special ones (regarding health) necessary for organising travel abroad for example
- i. Issuing certifications
- l. Organising and Managing training courses/internships of the data subjects at third parties
- m. providing additional services made available to the students, including the canteen service
- n. managing the teaching materials provided by ISF and allocated to the exclusive use of the student;
- o. managing and organising the activities and ensuring that the ISF procedures and standards are respected
- p. if necessary, protecting a legitimate interest, asserting or defending a right; managing any (legal or out-of-court) dispute
- q. giving external visibility to the ISF activities also by publishing audio-videographic recordings on the school websites, on the social media or through other publically accessible channels. For this use specific consent is requested.

2.4 WHY THE DATA CAN BE PROCESSED - legal basis of the data processing

The data can be processed:



- > insofar as they are necessary to satisfy the requests of the data subjects and to fulfil obligations deriving from a contract to which the data subject is party, and the connected legal obligations (in particular for the purposes indicated in the previous paragraph at points a - b - c - d - e - f - g - h - i - l - m - n)
- > insofar as they are necessary for pursuing legitimate interests of the data controller, consisting of the correct organisation and planning of the activities and of the improvement of its service (in particular for the purposes indicated in the previous paragraph at points a - b - n - o - q),
- > insofar as is necessary to assert or defend a right in courts of law or to assess whether there is a right that can be usefully protected in courts of law,
- > insofar as they come from public registers accessible to anyone and/or made manifestly public by the data subject (in particular for the purposes as indicated in the previous paragraph at points a - b - c - d - o - p)
- > since the data subject has expressed his or her consent, even after the moment of enrolment (in particular in relation to processing the data coming within the special categories described above and for special categories of personal data and for the purposes laid down in the previous paragraph at points h - l - m - n - q).

2.5 DATA PROCESSING METHOD

In relation to the above-mentioned purposes, the processing of the personal data may be performed with manual, electronic and data transfer instruments and will include all the operations or series of operations necessary for the relevant processing; always guaranteeing the most absolute confidentiality, pertinence and not extending beyond the purposes described above.

2.6 STORAGE PERIOD

Without prejudice to what is envisaged by the laws on storage of administrative documentation, the data will be stored exclusively for the times permitted/imposed by the laws in force applicable to the specific purpose for which the data are stored.

The data provided by the data subjects or those which originate during the period of assessment for admission to the courses, in the event of the enrolment application not being accepted, either for a lack of places or for failure to meet the requirements, will be kept for 12 months after the last contact with the data subjects themselves.

The data necessary for reconstructing the academic career, essential for demonstrating the correctness of the activities performed by ISF and the validity of the academic qualification obtained, even for the future, will be kept in a confidential form also at the disposal of the student him or herself for a period of time sufficient to include his or her professional life (approximately 50 years).

2.7 WHO THE DATA CAN BE PROCESSED BY

The data can be processed by the following categories of processors and/or persons acting under their authority for the same purposes, always and only within the limits of what is effectively necessary to carry out their functions:

- Within their own tasks, ISF personnel within the limits of the assignments received and with what is envisaged by the company procedures
- Teaching staff;
- Personnel who are assigned the function of managing/maintaining the information systems – System administrators;
- Manager of the Prevention and Protection/Security Service
- Security and access control Managers and operators;
- Subjects (Companies/freelance professionals, even outside the European Union where this is necessary in relation to the purposes indicated above) who collaborate in their capacity of Data Processors pursuant to art. 28 Regulation EU 679/2016 in the activities, or provide services functional to them, such as: information system management, training services, organisational consultancy, services connected to business trips and travel, medical and nursing assistance, canteen services, etc.; regarding this, it is hereby pointed out that these subjects will always and anyway be obliged to fully respect the standards and procedures aimed at guaranteeing the broadest control and protection of the personal data adopted and imposed by the Data Controller also and not only in fulfilment of the laws in force.

2.8 COMMUNICATION ENVIRONMENT - WHO THE DATA CAN BE COMMUNICATED TO

Without prejudice to the communications carried out in fulfilment of legal obligations, this personal data can be communicated or made available:

- ⇒ to public administrations, for carrying out institutional functions, within the limits established by the law and by regulations;
- ⇒ to subjects who can access the data pursuant to community legal provisions, regulations or rules, within the limits envisaged by these rules,



- ⇒ to insurance companies and other Authorities/Associations/Companies/credit Institutions for purposes connected to the execution of obligations linked and/or connected to the academic and teaching activities,
 - ⇒ to third party subjects and authorities where academic and/or extracurricular activities, like training courses or work placement is performed;
 - ⇒ at the end of the study cycles, to the scholastic institute or university where the student continues his or her academic career,
 - ⇒ to foreign embassies/consulates, in the event of trips abroad.
 - ⇒ to suppliers of related or additional services to the purposes indicated above, like: services necessary for carrying out courses, organising journeys and trips, managing some information systems.
- These suppliers that the data subject will be made aware of, as and when required, may also be abroad, either inside or outside the European Economic Area.

Naturally the communications described above are exclusively limited to the data necessary for the recipient Authority to carry out its own tasks and/or to achieve the purposes connected to its communication, always related to the purposes indicated above.

2.9 TRANSFER ABROAD

As already mentioned, the personal data may also be transmitted to subjects even located outside the European Union, where this is necessary in relation to the requests of the data subjects or for the purposes indicated above; more particularly:

- > **to the other branches of the American Schools Abroad, Inc in the world according to the requests of the data subjects,**
- > **to the countries where activities related to teaching are carried out or organised,**
- > **where suppliers' offices are located, in this case dependant on respecting specific precautions aimed at guaranteeing a level of protection complying with the European laws (for example cloud service providers)**
- > **to subjects indicated by the data subject on request and with their consent (for example when we communicate the data to the destination scholastic institute or university)**

The transfer will always be carried out in full respect of the law and may only be carried out in the presence of the rights of legitimacy indicated at point 1.

2.10 DISSEMINATION

As mentioned above, the picture of the student may be published on photos inside the ISF campus, with the purpose of promoting the socialisation and communication between the students.

Apart from this, the pictures can be published, informing the data subject as and when applicable, also in relation to some teaching initiatives undertaken within the education to the correct use of social networks or for publishing works made by the students.

Furthermore, the pictures and audio-video recordings regarding the events organised by ISF, in which students and parents participate, may also be published on the websites created for the event.

Finally, as already indicated, with the consent of the data subject, ISF may publish videos-photographs portraying the data subjects and/or audio recordings on company intranet or internet websites or connected to the Company or on company documentation in order to give external visibility to the activities and complete the presentation.

2.11 THE IMPORTANCE OF TECHNOLOGY AND OF SOCIAL NETWORKS

In formulating the study programmes, we considered the fact that technology is not only an essential instrument for learning, but is also fundamentally important for both the growth and the management of social and interpersonal relations.

The students of ISF are introduced to digital technology and online socialisation from the first years.

Our programme is structured in order to introduce the pupils to these subjects as early as the initial stages, gradually increasing the degree of independence alongside the development of the digital citizenship.

For this purpose, during the lessons the Google for Education platform is used.

The pre-primary students share their work through alternated movement and the older pupils have access to the curriculum, to assessment and reporting on ManageBac.

The following figure offers a simple overview on what platforms are used and on the different methods adopted with respect to the various degrees of the child's education



	Account and email	Apps and programs	School's network
EL	Students don't have a school Gmail address.	Students have access to the Softwares installed on the Computer Lab's PC/Mac and applications installed on the class shared tablets	Students use a generic account to access Computer Lab's PC/Mac
K	Students can share their portfolio using SeeSaw on the school shared tablets, with parent consent		
G1	Students take ownership of their own School Gmail account with parental consent.	Students have access to the Applications installed on their school tablets. Students can access Engrade with parental consent.	Students take ownership of their own school AD Account to access Computer Lab and Library's PC/Mac. Students access to a dedicated school wi.fi with parental consent with the school devices'.
G2			
G3			
G4			
G5			
G6	Gmail password may be held by parent or student with parental control.		Students access with their own personal devices, to a dedicated school wi.fi with parental consent
G7			
G8			
G9			
G10	Students take ownership of their Managebac account		
G11			
G12			

The envisaged uses include iSAMS, our online learning platform in which the students can access the information on their own curriculum and homework or the Google teaching suite where the students can store their files or collaborate with colleagues.

In consideration of the fact that the new rules (Regulation EU 2016/679 and Legislative Decree 196/2003) allow 14 year-olds to give their own independent consent to data processing connected to the use of social network platforms, when we provide the students with access to these systems through personal accounts, we may, according to the age of the child, share the details of the account with the parents, or ask them to give their child permission to access the system.

2.12 COMMUNICATION AND UPDATING DATA - WHEN IT IS OBLIGATORY TO COMMUNICATE YOUR OWN DATA

Communicating and updating your data is compulsory, as regards the fulfilments envisaged by the legal rules and for the purposes laid down in letters a-b-d-e-g. Failure to comply with this obligation by the data subject means that it would be impossible for ISF to accept the student's application and/or correctly manage the teaching activities.

3. PROCESSING CONNECTED TO CONTRACTUAL-ADMINISTRATIVE FULFILMENTS

This paragraph reports information regarding processing connected to the contractual relationship

3.1 DATA PROCESSED

- > Data and information processed directly by the data subject (person or subject who establishes the contractual relationship with ISF: Pupil with age of majority, parent or guardian, authority which subsidises the pupil's studies, etc.) or from subjects delegated/authorised by the latter and/or regarding the contractual relationship established with ISF
- > administrative-fiscal data;
- > data regarding pre-contractual information (including data freely acquirable from public or publically accessible sources);
- > data that arises during the course of the contractual relationship regarding the purchased services, the punctuality of the payments, particular agreements.
- > data acquired or which originate during the course of the activities carried out on request/mandate of the data subject, also concerning third party subjects who have relations with the data subject him or herself. **3.2 DATA ORIGIN**

With the exception of the data that originates within the organisation of the Data Controller regarding the contractual relationship, Acquiring and Updating the data is normally carried out by means of the Customer him or herself or by subjects authorised/delegated by them, or from public registers, lists, deeds or documents, which are available to anyone or from lists/documents acquired by third parties authorised by virtue of specific rules of law (e.g.: Chamber of Commerce).

3.3 WHY THE DATA CAN BE PROCESSED - legal basis of the data processing

The data can be processed, always in relation to the purposes indicated below:

- > insofar as they are necessary to fulfil obligations deriving from a contract to which the data subject is party, and the connected legal obligations (in particular for the purposes indicated in the paragraph below letters a - b)
- > insofar as they are necessary for pursuing legitimate interests of the data controller, consisting of the correct organisation and planning of the activities and of the improvement of its service, of protecting equity and credit, in processing personal data for direct marketing purposes, always considering the reasonable expectations nurtured by the data subject on the basis of his or her relation with the data controller (in particular for the purposes indicated in the paragraph below letter h),



- > insofar as is necessary to assert or defend a right in courts of law or to assess whether there is a right that can be usefully protected in courts of law,
- > insofar as they come from public registers accessible to anyone and/or made manifestly public by the data subject, (in particular for the purposes as indicated in the paragraph below letter e-)
- > since the data subject has expressed his or her consent (in particular for the purposes indicated in the paragraph below letter h.).

3.4 PURPOSES OF PROCESSING

The processing that the personal data requested or acquired will be subject to, either before the establishment of or throughout the commercial relationship or after its end, have the following purposes:

- a. fulfilling contractual and accounting and fiscal obligations deriving from the commercial relationship to which the Data Controller is party; fulfilling community laws, standards and regulations; fulfilling orders given by Judicial Authorities, financial ones, from insurance institutions;
- b. purposes strictly connected to and instrumental to the management of relations with customers or with suppliers, always in relation to the management of the contract and of the activities regulated by it. Satisfying the data subject's requests,
- d. verifying the degree of satisfaction and the quality of the services provided, through telephone interviews or requests for filling in forms;
- e. preliminary assessments to establishing a contractual relationship;
- f. internal operative and managerial needs like Customer record management, address books and statistical calculations within the company.
- g. if necessary, protecting a legitimate interest, asserting or defending a right; managing any (legal or out-of-court) dispute
- h. Unless the data subject is of a different opinion, the email address provided by him or her when establishing the commercial relationship will be used for sending courtesy communications and/or informative materials regarding initiatives promoted by ISF as permitted by paragraph 4 of art. 130 of Legislative Decree 196/2003.

3.5 DATA PROCESSING and storage methods

In relation to the above-mentioned purposes, the processing of the personal data may be performed with manual, electronic and data transfer instruments. Always guaranteeing the most absolute confidentiality, pertinence and not extending beyond the purposes described above, in terms of recording and data storage periods.

After the end of the contractual relationship, the personal data indicated in this disclosure, without prejudice to what is envisaged by the laws on storage of administrative documentation, will be stored exclusively for the times permitted/imposed by the laws in force applicable to the specific purpose for which the data are processed, anyway for a period not exceeding ten years after the last relationship with the data subject.

3.6 WHO THE DATA CAN BE PROCESSED BY

The data can be processed by the following categories of processors and/or persons acting under their authority for the same purposes:

- Directors and management,
- Personnel responsible for managing/maintaining IT systems;
- Personnel assigned to administration and other ISF personnel within the limits of the assignments received and with what is envisaged by the company procedures;
- Subjects (Companies/freelance professionals) who collaborate in their capacity of Data Processors pursuant to art. 28 Regulation EU 679/2016 in the activities, or provide services functional to them, such as: tax and accounting fulfilments, information system management, financial services, credit recovery; regarding this, it is hereby pointed out that these subjects will always and anyway be obliged to fully respect the standards and procedures aimed at guaranteeing the broadest control and protection of the personal data adopted and imposed by the Data Controller also and not only in fulfilment of the laws in force.

3.7 COMMUNICATION ENVIRONMENT - WHO THE DATA CAN BE COMMUNICATED TO

The personal data processed may be disclosed to:

- > any suppliers in relation to contractual and/or legal obligations and/or for public relations purposes;
- > public administrations for the performance of official duties within the limits established by the law and regulations;
- > other Authorities/Associations/Companies/credit Institutions for purposes connected to the execution of obligations linked and/or connected to the contractual relationship,
- > companies/consultants who need to access the data for additional purposes to the contractual relationship within the limits strictly necessary for carrying out the tasks assigned to them, such as: assistance in carrying out or direct execution of tax/accounting fulfilments, managing information systems, financial services;

who will be fully accountable for the processing performed in their structures, always for the purposes specified above and who will be obliged to fully respect the obligations of confidentiality and security.

Naturally all the communications described above are exclusively limited to the data necessary for the recipient Authority to carry out its own tasks and/or to achieve the purposes connected to its communication itself.

3.8 TRANSFER ABROAD

The personal data of accounting and tax nature can be transferred:

- > to the headquarters of the Data Controller located in the U.S.A.
- > to subjects located outside the European Union to the country where the data subject resides or finds him or herself exclusively if the above-mentioned legitimacy assumptions are fulfilled and in respect of the laws in force.



3.9 DISSEMINATION

Unless otherwise and separately agreed, the data processed indicated in this section will not be disseminated.

3.10 COMMUNICATION AND UPDATING DATA - WHEN IT IS OBLIGATORY TO COMMUNICATE YOUR OWN DATA

Communicating and updating your data is compulsory, as regards contractual and tax fulfilments envisaged by the legal rules in force and the execution of the obligations deriving from the supply or assistance contract. Failure to comply with this obligation by the Customer would make it impossible for the Data Controller to accept the supply and to carry out all the normal procedures connected to the commercial relation existing between the data subject and the Company itself.

4. VIDEO SURVEILLANCE IN THE OFFICES

In relation to the particular context that characterises its own activity and the particular needs of safety connected to it, ISF has deemed it necessary to install video surveillance systems (always equipped with a video recording system) in its own structures, above all to guarantee a suitable level of protection and to safeguard the pupils; the areas of the ISF offices subject to video surveillance are always indicated by suitable signs. The video cameras are authorised by the Provincial Labour Directorate of Florence, with a specific deliberation.

The systems are installed for the following purposes:

- > access control,
- > guaranteeing the safety of the pupils, of the personnel and of the guests, allowing situations of particular danger or accidents to be revealed
- > allowing the correct extent of the security personnel's intervention to be calculated,
- > safety of the Offices and of the systems - safeguarding the property - preventing any damage, theft or unlawful removal of assets.

Apart from what is reported above, the video recordings made by the systems can be used:

- > to fulfil orders made by the Judicial Authority and/or the Police Authorities;
- > in order to assert or defend even a third party right, provided that, if these data can reveal the state of health, the right to be asserted is of equal or higher value than that of the data subject;
- > if necessary, in order to complete the documentation accompanying accident reports sent to insurance Companies.
- > for reconstructing the occurrence of significant facts for the safety of the pupils, of the personnel and of the guests or in the event of unlawful acts perpetrated to the detriment of the Company.

5. RIGHTS OF THE DATA SUBJECT

The data subject is entitled:

- > to request from the data controller access to and rectification or deletion of personal data or restriction of processing of the data concerning the data subject and to object to their being processed,
- > if the processing is performed automatically (electronically) and on the basis of their consent, to receive the personal data concerning them in a structured format, of common use and legible and/or to obtain direct transmission to another Data controller, if it is technically feasible,
- > to revoke their consent at any moment (without jeopardising the lawfulness of the processing based on the consent before the revocation), this obviously for processing carried out on the basis of this assumption,
- > to lodge a complaint with a supervisory authority; Personal data processing authority - Piazza di Monte Citorio n. 121 - 00186 ROME - Fax: (39) 06.69677.3785 - Telephone: (39) 06.696771 - E-mail: garante@gdp.it - Certified email: protocollo@pec.gdp.it.

The above rights may be exercised by request sent without particular formalities to the Data Controller, even through a delegate.

Requests should be made to the Data Controller, also by means of registered letter with advice of receipt or by sending a communication to the Data Controller at the address **privacy@isfitaly.org** or to the contact addresses in the CONTACT US area, remembering that it will not be possible to respond to telephone requests, which do not give the certainty as regards the identity of the applicant.

It is also pointed out that any consent given to ISF may be revoked at any moment, without jeopardising the lawfulness of the processing performed before the revocation itself.