

## NOTICE ON PERSONAL DATA PROCESSING PURSUANT TO ART. 13 EU REGULATION 679/2016

Procura Generalizia delle Suore del Sacro Cuore di Maria Vergine Immacolata, the governing body of Marymount International School, with registered address in Roma, Via Nomentana n. 355, managing body of Marymount International School Rome, as Data Controller (“**Data Controller**” or the “**School**”) and in accordance with article 13 of EU Regulation 679/2016 – General Data Protection Regulation (hereinafter also “**Regulation**”), informs how processes the personal data, relating to students and their families, collected through the application form and the enclosed forms.

**DATA CONTROLLER:** Procura Generalizia delle Suore del Sacro Cuore di Maria Vergine Immacolata, the governing body of Marymount International School, with registered address in Roma, Via Nomentana n. 355, managing body of Marymount International School Rome (“**Data Controller**” or the “**School**”).

**CATEGORIES OF DATA:** The School processes the personal data, relating to students and their families, collected through the application form and the enclosed forms (“**Personal Data**”), such as by way of example identification data and contact details, data relating to religious affiliation and health, image (including audio).

Personal Data is processed in application of the principles of correctness, lawfulness, transparency and protection of your privacy and your rights.

**PURPOSES OF THE PROCESSING AND LEGAL BASIS:** Personal Data are collected and processed for the following purposes from time to time applicable:

- A. Correct management of School enrolment and provision of its services on the basis of the legislation currently in force (for example, to use the canteen service it is necessary to have information on any intolerances, allergies, food pathologies; the data relating to health status may be processed for the adoption of specific support measures for students with disabilities or learning disorders; for participation in sports activities, guided tours and educational trips);
- B. Data processing in accordance with Law no. 119/2017, which provides for the request of certain documents proving the fulfilment of vaccination obligations;
- C. Purposes relating to the management and sending of service communications by telephone, sms, e-mail, post;
- D. Administrative, fiscal or accounting purposes in order to fulfil the obligations generally provided for the Data Controller by laws or regulations, EU legislation, requests from the judicial authorities or to exercise Data Controller’s rights;
- E. Purposes relating to the protection of persons, property and company assets;
- F. Promotional purposes of the activity and image of the School.

Processing of Personal Data for the purposes under points A, C and D finds its legal basis in the article 6 (1)(b) of the Regulation, according to which the “*processing is necessary for the performance of a contract to which the data subject is party*”. The failure to communicate the Personal data will prevent the Data Controller to provide its services.

Processing of Personal Data for the purposes under point B finds its legal basis in the article 6 (1)(c) of the Regulation, according to which the “*processing is necessary for compliance with a legal obligation to which the controller is subject*”.

Processing of Personal Data for the purposes under point E finds its legal basis in the article 6 (1)(f) of the Regulation, according to which the “*processing is necessary for the purposes of the legitimate interests pursued by the controller*”, to be identified in the protection of persons and property of the School against possible aggression, theft, robbery, damage and vandalism.

Processing of Personal Data for the purposes under point F finds its legal basis in the article 6 (1)(a) of the Regulation, according to which “*the data subject has given consent to the processing of his or her personal data for one or more specific purposes*”. The failure of consent will prevent the Data Controller to use the personal data of the minor for the purposes described above. The consent may be withdrawn at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

Personal Data qualified as “special categories of personal data”, such as those relating to religious affiliation and health, are processed pursuant to article 9(2)(c) and article 9(2)(g) of the Regulation.

**RECIPIENTS AND TRANSFER OF PERSONAL DATA:** Personal Data may be processed by recipients or categories of recipients acting as Data Processor pursuant to article 28 of the Regulation or as authorized subjects according to article 29 of the Regulation.

Apart from the above, Personal Data will not be communicated exception made to subjects, entities or authorities to whom said communication is mandatory by Law or Regulation.

Personal Data may be processed outside the EU. In this case, the Data Controller will implement the mechanisms provided by the Regulation (for example the implementation of standard contractual clauses approved by the European Commission) in order to ensure an adequate level of protection in compliance with European data protection legislation standards.

**RETENTION OF PERSONAL DATA:** Personal data, also belonging to "special categories" of data, will be processed also by automated means and will be stored for the entire duration of the contractual relationship and, at the end of such a relationship, for the time provided - for each category of data - by current accounting, fiscal, civil and procedural regulations, and in any case no longer than 10 (ten) years from the conclusion of the contractual relationship.

In case of publication and dissemination of images and/or video on School's website or other online channels, the processing will be temporary since the above mentioned images and/or video will remain on School's website or other online channels only for the time strictly necessary for the purposes for which they have been collected. In the above mentioned images and/or video minors will be portrayed only in "positive" moments related to the School's activities.

**DATA SUBJECTS RIGHTS:** Each data subject has the right to request to Data Controller, at any time, the access to their personal data, the rectification or the deletion of the same data or the right to object to the processing; has the right to request the limitation of the processing in the cases provided by article 18 of the Regulation, as well as to receive copy of their personal data in a structured, commonly used and readable by automatic devices and ask for the transmission of such data to another data controller according to article 20 of the Regulation.

In addition, each data subject has the right to lodge a complaint with the competent supervisory authority (*Garante per la Protezione dei Dati Personali*), according to article 77 of the Regulation, if the data subject considers that the processing of personal data relating to him or her infringes the legislation in force.

Requests should be addressed in writing to: Marymount International School Rome, Via di Villa Lauchli, 180 - 00191 Roma; email [development@marymountrome.com](mailto:development@marymountrome.com). The School has appointed a Data Protection Officer pursuant to article 37 of the Regulation, who can be contacted by the following e.mail: [dpo@marymountrome.com](mailto:dpo@marymountrome.com).

## Privacy waiver and consent for the use of photo/video images

I, the undersigned (*Name and Surname*) \_\_\_\_\_, born in  
(*Place and date of birth*) \_\_\_\_\_, domiciled in \_\_\_\_\_,  
Via \_\_\_\_\_ n. \_\_\_\_\_, Fiscal Code \_\_\_\_\_,  
as subject who exercises the parental authority on the minor (*Name and Surname of the minor*) \_\_\_\_\_,  
born in (*Place and date of birth of the minor*) \_\_\_\_\_, in accordance with the rules governing  
the exercise of parental authority provided in articles 316, 337 *ter* and 337 *quarter* of Italian Civil Code,

Agree       Do Not Agree

to the publication and/or dissemination, in any form and through any technical medium, of the images, also taken in video format, and any audio data of the minor for advertisement, cultural, or institutional purposes, and in general for promotional goals related to the School's activities, as well as to the use and publication of the images of the minor in the yearbook issued by the School.

In addition, according to the Copyright Act (Royal Decree no. 633/1941), articles 96-97, and to articles 10 and 320 of Italian Civil Code, in relation to the photo/video images and any audio data recorded during the School's activities, I hereby grant freely and indefinitely, until written withdrawal (to be sent via e-mail to the following address [development@marymountrome.com](mailto:development@marymountrome.com)) the publication and/or dissemination rights of the images of the minor on the social channels and the School's website, and/or in any form for promotional goals, such as posters, flyers, *brochures*, commercials, etc.

The use of photo/video images and any audio data of the minor, as well as of further personal data, shall take place in compliance with the attached privacy notice.

\_\_\_\_\_  
Date

\_\_\_\_\_  
(Parent/Guardian Signature)