



# MUSICA — GORITIENSIS International Masterclasses

## **INFORMATION pursuant to art. 13 of Legislative Decree 196/2003 (TU) - pursuant to art. 13-14 GDPR**

The Data Controller is CSEM EMIL KOMEL C.F. 91004530316 Viale XX Settembre 85, Gorizia (GO), tel. 0481/532163 and 0481/547569  
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### **Preliminary remarks**

Article 13 of Legislative Decree no. 196/2003 (Consolidated Law) and Articles 13 and 14 of EU Regulation 2016/679 (GDPR), define the rules of information on the management of personal data.

Pupils (and their legal guardians), as data subjects, should be given appropriate access to this information and may request further information from the secretariat.

### **Purpose of data processing**

Purpose: the processing of personal data of pupils, and, if necessary, their families, is aimed at the institutional activities required (teaching, guidance, training, organization, administration), in accordance with the obligations under laws and regulations.

### **Legal basis for data processing**

Legal basis: the main legal basis of personal data processing is the fulfilment of obligations arising from laws, rules and/or Community and national regulations; it does not require consent but the information must be provided. The legal basis of personal data processing for specific purposes other than institutional and mandatory is the consent of the data subject. Minors under the age of 16 are represented by their legal guardians who give their consent when required; minors under the age of 16 can give their consent to data processing when required.

### **Methods of data collection and processing**

Methods: personal data are provided at the time of registration directly by the pupil or family / guardians. The processing is carried out according to the principles of lawfulness, correctness and transparency towards the data subject and treated in accordance with the purposes of the processing. The data collected are "minimized", i.e. adequate, relevant and limited to what is strictly necessary for the purposes of processing, accurate and up to date; they are processed on paper media and computer databases locally and / or in the cloud. The collection of any photographic/video/audio data is carried out with the Data Controller's own means or by the authorised persons in charge. The data processing is carried out mainly within the school, as well as by the Manager, and also by employees in charge of processing of data relating to their institutional tasks: Director, Teachers (and similar trainers), technical / administrative staff, teaching staff. Any processing to be carried out externally, for specific activities that cannot be carried out internally, is entrusted to persons of proven reliability designated for external processing by a specific appointment signed by the Manager. If agreed, the data will also be processed with the purpose of sending information as well as commercial and promotional materials relating to the activities and services provided by the Data Controller, through automated means, such as e-mail and text messages, as well as traditional means, such as telephone, in full compliance with the principles of lawfulness and correctness and the provisions of law. For any processing purpose other than that for which the data were collected, the Data Controller will provide the data subject with all necessary information. The overall processing is overseen from collection up to the historical archiving over the permitted period. Should data not be obtained by the Controller directly from the data subject, the present information must be provided no later than one month after obtaining the data or at the time of the first communication with the data subject or before any first communication with another recipient of the data.

### **Profiling**

The Data Controller does not use automated profiling tools.

### **Compulsory or optional nature of data provision**

In order for the school to carry out the data processing as defined in the purpose/methods section, data subjects are required to provide all mandatory personal data and may submit additional optional data in order to obtain individual benefits linked with status or merit.

Mandatory data: personal data of family members/guardians; complete personal data of the pupil, official documents needed for the school curriculum.

Optional data: necessary in order to obtain services on demand and benefits (subsidies, exemptions, extra-curricular activities); data/photos of events/educational or complementary activities.

Pictures (individual and group photos/videos) of pupils related to complementary school activities (trips, outings, performances, concerts, parties, etc.) may be taken. The dissemination of such data through the school's own means (website, facebook, internal bulletin, ...) may be carried out after an assessment of the risks associated with underage pupils and with the documented consent of the data subjects, who may exercise their blocking and cancellation rights at any time.

### **Consequences of a possible refusal to provide information**

The consent to the processing of mandatory data functional to the management of the employment contract is not due by virtue of the contract holder's mandatory fulfilment of legal obligations.

Failure to provide optional data necessary for the achievement of benefits / rights of economic and/or healthcare nature, will not allow the employee to enjoy the aforementioned benefits and rights.



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## Subjects and Categories receiving the data and areas of Communication/Dissemination

The communication/dissemination, in compliance with the rules, concerns only the data that have been consented to and is only allowed for mandatory institutional purposes.

Communication: to public and private entities in compliance with laws, contracts and regulations: Ministry of Education, University and Research and similar bodies, local and regional authorities, public bodies/auditing authorities, health authorities, tax authorities, welfare bodies, host companies, insurance companies, transport companies, training and educational partners, treasury institutions, trade unions by proxy.

Dissemination: for legal obligations exclusively, only in the cases due, on the official Notice Board and on the school's website and through the school's other means of communication.

## Data retention

The data are retained for the duration of the pupil's course of study; the duration is established by specific rules and regulations or according to criteria that apply to the specific nature of the processing.

## Rights of the data subject

The data subject (or their legal guardians) can assert their rights against the Data Controller, requesting information on personal data in relation to: origin, collection, purpose, method, logical process applied and can exercise their rights on: access, rectification, deletion (oblivion), limitation, right to data portability (law applicable only to data in electronic format), as governed by art. 20 of the GDPR.

A data subject (or their legal guardians) who finds that their data are being processed in breach of the law may lodge a complaint with the supervisory authority.

Please note that since the processing of data is based on Article 6(1)(a) or Article 9(2)(a) of EU Regulation 2016/679 you have the right to revoke your consent at any time without prejudice to the lawfulness of the processing based on your consent before revocation.

The data subject (or their legal guardians) has the right to revoke their consent given for one or more specific activities without prejudice to the lawfulness of the processing based on previous consent. The administrative secretarial staff, suitably trained, is responsible for providing the data subject (or legal guardians) with the requested information and documentation so far as permitted by the rules and regulations.

For further information, please consult the institutional website of the Privacy Data Protection Authority: [www.garanteprivacy.it](http://www.garanteprivacy.it)

Contact details:

Principles applicable to the processing of special categories of personal data (sensitive and judicial)

Any requests, collections, processing of particular categories of data (sensitive and judicial), occur if:

- the data subject has given their explicit consent to the processing of such data
- the processing is necessary to fulfil the obligations and exercise the specific rights of the data subject or of the Data Controller
- the processing is necessary to protect a vital interest of the data subject
- the processing concerns data made manifestly public by the data subject
- the processing is necessary for the establishment, exercise or defence of rights in judicial proceedings or when the authorities exercise their judicial functions
- the processing is necessary for reasons of overriding public interest on the basis of Union and Member State law
- the processing is necessary for the purposes of preventive medicine, diagnosis, assistance and/or therapy, therefore for institutional, didactic, organisational and administrative tasks and for treatments that could not be carried out with data of a different nature.

The processing of data relating to criminal convictions and offences shall be carried out only under the control of the public authority.

The undersigned \_\_\_\_\_ has read and understood this 'privacy policy'.

Signature \_\_\_\_\_

To be completed by parents or guardians in the case of minors:

The undersigned \_\_\_\_\_ has read and understood this 'privacy policy'.

Signature \_\_\_\_\_

The undersigned \_\_\_\_\_ has read and understood this 'privacy policy'.

Signature \_\_\_\_\_

Date and place \_\_\_\_\_