

**INFORMATION ON THE PROCESSING OF PERSONAL DATA
under Regulation (EU) 2016/679 of the European Parliament and of the
Council of 27 April 2016 ("GDPR" or "Regulation")**

BODY TEMPERATURE MEASUREMENT

Summary

- Art. 1 Identity and contact details of the Data Controller**
- Art. 2 Purpose and legal basis for the processing of personal data**
- Art. 3 Categories of subjects to whom the Data Controller communicates the user's personal data (recipients)**
- Art. 4 Retention of personal data**
- Art. 5 Communication to third parties**
- Art. 6 Transfer to third countries**
- Art. 7 Rights of the interested party**

Art. 1 Identity and contact details of the Data Controller

The European *School* of Varese ("Data **Controller**") is responsible for the processing of personal data of people who access this office and having as its object the data collected for the purpose indicated therein.

The identification details and contact details of the Data Controller are as follows:

European School of Varese, located in via Montello n. 118 Telephone: 0332/806111

Art. 2 Purpose and legal basis for the processing of personal data

In order to access the premises of the Data Controller it is necessary to measure the body temperature in real time.

This measure is necessary to prevent the spread of the COVID-19 coronavirus, also in accordance with the provisions of Ordinance no. 546 of the Lombardy Region "*FURTHER MEASURES FOR THE PREVENTION AND MANAGEMENT OF EPIDEMIOLOGIC EMERGENCY FROM COVID-19. ORDINANCE PURSUANT TO ARTICLE 32, PARAGRAPH 3, OF LAW NO. 833 OF 23 DECEMBER 1978 ON HYGIENE AND PUBLIC HEALTH AND ARTICLE 3 OF DECREE LAW NO. 19 OF 25 MARCH 2020*".

Real-time temperature measurement is a processing of personal data.

The purpose of this treatment is exclusively the prevention of contagion from COVID-19.

The legal basis of the processing is the need to comply with a legal obligation to which the Data Controller is subject (art. 6 letter c) of the GDPR), namely the implementation of anti-accounting security protocols.

Allowing real-time temperature detection is a treatment of the personal data necessary to access the premises. Therefore, any refusal to do so will make it impossible for the Data Controller to comply with a legal obligation and, consequently, make it impossible for you to access the premises.

Art. 3 Categories of subjects to whom the Data Controller communicates the user's personal data (recipients)

Any personal data collected pursuant to this information notice will be processed by the Data Controller's staff in charge of processing and acting for the Data Controller as designated pursuant to art. 2-quaterdecies of Legislative Decree 101/2018.

Art. 4 Retention of personal data

The Data Controller does not keep the personal data acquired after the real time measurement of the temperature.

The Data Controller may limit itself to recording the exceeding of the temperature threshold only if it is necessary to document the reasons that prevented access to the company premises.

Any personal data collected on the basis of this information will be kept by the Data Controller until the end of the state of emergency decreed at national or local level as a result of the spread of COVID-19.

In any case, once the state of emergency has ceased, any personal data stored by the Data Controller pursuant to this information notice will be deleted by the Data Controller itself.

Art. 5 Communication to third parties

Any personal data collected by the Data Controller will not be disclosed or communicated to third parties outside of the specific regulatory provisions (e.g. in case of a request by the Health Authority for the reconstruction of the supply chain of any close contacts of a worker who tested positive at COVID-19).

Art. 6 Transfer to third countries

No personal data collected under this policy will be transferred and stored in third countries.

Art. 7 Rights of the interested party

The Data Controller informs you that in the processing of your personal data you have all the rights provided for by the Regulations, in particular:

- the right of access ex art. 15 of the Regulation
- the right of rectification under Article 16 of the Regulation
- the right to cancellation (right to oblivion) ex art. 17 of the Regulation
- the right to limit processing pursuant to art. 18 of the Regulation

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State in which you habitually reside or work or in the place where the alleged infringement has taken place, if you consider that the processing concerning you is in breach of the Regulation.

Varese, 18/05/2020

European School of Varese