

DATA POLICY STATEMENT

Pursuant to the UE Regulation no. 2016/679 in force from the 25th of May 2018 and to the applicable regulation, Cooperativa Trasporti Scuola Europea di Varese, Controller of the processing of data, would like to inform you about the purposes and methods of the processing of your personal data.

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1. DEFINITIONS

In order to facilitate the understanding of this agreement, the meaning of some of the words used is hereby provided:

- **Processing:** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **Personal data or Data:** means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Controller:** Cooperativa Trasporti Scuola Europea di Varese, which determined the purposes and means of the processing of personal data of the interested party.
- **Processor:** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- **Interested party:** the subject to which Personal data refers.

2. TYPES OF PROCESSED DATA

Data can be collected and processed by the Controller for the purposes detailed below.

Data are collected directly from the interested party during the signing of the Transportation Service Agreement or during the registration process in the website or web shop's database. The Controller processes, for example, the following Personal Data: name, surname, email address and residence, fiscal code, date and place of birth, also of the minor children to whom the service is intended. There is no tracking of browsing on our website through cookies, IP address, type of browser and device used.

The Controller does not process Data that are not strictly necessary to the purposes detailed below.

3. PURPOSES OF THE PROCESSING

Your data will be exclusively used for the following purposes:

- a) to guarantee the correct supply of the requested services and the execution of the transportation service and, thus, to fulfil in a correct and precise manner all the terms of the contract stipulated with you, including sending informative communications concerning the transport, to verify the compliance with the correct procedures, as well as the terms arising from the law or from regulations in force, among which are the ones arising from the fiscal legislation as well as from the public security provisions;
- b) for administrative and accounting purposes;
- c) for subscribing to the Cooperativa Trasporti's mailing lists and the possible sending of informative material and products and services offered by Cooperativa Trasporti Scuola Europea di Varese or by third-parties, through automated means, such as e-mail, fax, SMS or MMS; your data will never be transferred nor used for market investigations or for sending advertising material.

4. CONFERRAL OF PERSONAL DATA

Conferral of your personal data for the purposes listed in the foregoing points a), b) and c) is a necessary condition for the provision of the service, and in absence of conferral, the Cooperativa Trasporti Scuola Europea di Varese cannot provide the requested services.

5. DATA PROCESSING METHOD

Your data will be processed with electronic, automated or paper means, according to the modalities and the instruments eligible to grant the safety and the confidentiality of the data, in compliance with the prescriptions of the EU Regulation no. 2016/679 and to the applicable regulation. In particular, all the technical, IT, organizational, logistical and safety procedural measures will be adopted, so that the protection level is granted as provided for in Regulation, by allowing access only to persons in charge of the processing and authorized by the Controller or by the Responsible appointed by the Controller.

The acquired information and the processing methods will be coherent and will not exceed the type of provided services. The data will also be managed and protected in an environment of which the access is under constant control.

6. DATA COMMUNICATION AND DISCLOSURE

Your data can be communicated:

- a) to all those parties (including Public Authorities) having access to the personal data according to by-law or administrative provisions or in compliance with the company regulation in force;
- b) to banking institution and to companies managing the national or international payment circuits, through which are made the online payment of products purchased on the website, in the near future;
- c) to companies, consultants or professionals eventually in charge of the set-up, maintenance, updating and, in general, management of the hardware and software used by the Cooperativa Trasporti Scuola Europea di Varese for the provision of its services;
- d) to all those public and/or private parties, physical and/or juridical subjects (legal, administration and tax firms, Chambers of Commerce, Law Chambers and Offices, etc.), if the communication is necessary or functional to the correct fulfilment of the contractual obligations arose, as well as of the by-law obligations.

The data regarding you will not be disclosed in an anonymous and aggregated way for statistical or research purposes.

7. RESPONSABLE OF THE PROCESSING OF PERSONAL DATA

In accordance with art. 28 of the EU Regulation no. 2016/679, Cooperativa Trasporti Scuola Europea di Varese has appointed as "Responsible of the processing" the following subject: Stefania Boschesi, Attorney, with her Law Firm in Varese, via Giuseppe Grandi no. 10.

8. PERSONAL DATA CONSERVATION PERIODS

Your personal data will be filed only for the time necessary to grant the correct provision of the services offered.

Once this period expires, your data will be stored and thus eliminated from the system or transformed into an anonymous form, not to permit – even indirectly – to identify the interested parties.

9. RIGHTS OF THE INTERESTED PARTY

According to the applicable regulation, you have the right – among others - to:

- a) obtain:
 - indications on the origin of the personal data, on the processing purposes and methods, on the legal basis and on the logic applied in case of treatment made through electronic instruments, in the event there is a automatic decision-making process and in this event, the importance and the consequences provided for by this processing;
 - indication of the identification details of both the Controller and Responsible of the processing;
 - details about the parties or the party categories the data can be communicated to or that can learn the data as representatives granted in the territory of the State, as responsible persons or persons in charge;
 - details about the period of time in which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
 - an access to your data and the possibility to update, adjust or integrate them;
 - the cancellation of your data without unjustified delay or the limitation of the processing;
 - the portability of the data, meaning the transmission of the data in a common format and readable by any device and the right to transfer them to another controller of the processing, in the event of a processing based of your consent or implemented by automated means;
 - proof that the operations mentioned in the previous points have been communicated, for what concerns their contents, to any third party to whom the personal data had been disclosed (except if this duty is impossible or entails the use of disproportionate means compared to the protected right);
- b) to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- c) to submit a complaint to an authority of supervision;
- d) to oppose, wholly or partially, at any time, to the processing of your data, if are used for commercial information purposes or to deliver advertising material or to direct sales or to carry out market or commercial communication researches.

CONDITIONS OF THE EXERCISE OF THE RIGHTS

The above rights can be implemented with a request made without any formality to the Controller: Cooperativa Trasporti Scuola Europea Varese, with its legal offices in Varese, Via Montello, 118.