



Annex B to MI note no. 1 of 7 January 2022 (original version IT)

Information on the processing of personal data

VERIFICATION OF PUPILS' VACCINATION IN THE SECONDARY CYCLE

*Verification of requirements under Article 4, paragraph 1, letter c), n. 2 of D.L. no 1 of 7 January 2022
(Art. 13 of EU Regulation 679/2016)*

This information notice provides information on the processing of the data of pupils of first- and second-degree secondary schools and of the vocational education and training system, who are involved in the activity of verifying the existence of the requirements to attend "in presence", in the cases and in the manner referred to in Article 4, paragraph 1, letter c), no. 2 of Decree-Law no. 1 of 7 January 2022.

1. Owner of the data processing

The owner of the data processing is the European School of Varese, with registered office in Varese, via Montello 118, tel. 0332806111, e-mail VAR-DIRECTOR@eursc.eu, in its capacity as the entity carrying out the checks pursuant to the above-mentioned regulations.

2. Data Protection Officer

The Data Protection Officer can be contacted at the following email address: VAR-DPO-CORRESPONDENT@eursc.eu

3. Purpose of processing and legal basis

The purpose of processing personal data is for the School to check that the pupils in whose classes there are two positive cases meet the requirements for attending "in attendance".

The legal basis for the data processing is the need to fulfil a legal obligation to which the Owner of the data processing is subject, as well as to perform a task carried out in the public interest or in connection with the exercise of official authority, respectively pursuant to Article 6(1)(c) and (e) of EU Regulation 679/2016. In addition, the processing is necessary for reasons of substantial public interest within the meaning of Article 9(2)(g) of EU Regulation 679/2016

The regulatory source from which the above legal obligations of the Data Controller derive is Article 4, paragraph 1, letter c), no. 2 of Decree-Law no. 1 of 7 January 2022, as subsequently interpreted by the note of the Ministry of Education and the Ministry of Health no. 11 of 8 January 2022.



4. Categories of processed data

As part of the verification process, only data from pupils in lower and upper secondary schools and the vocational education and training system in whose classes there are two positive cases will be processed.

More specifically, it will cover:

- common personal data as referred to in Article 4(1) of the EU Regulation 679/2016, namely: pupils' first and last names;
- data relating to pupils' health, falling within the special categories of data referred to in Article 9 of EU Regulation 679/2016, contained in the documents provided by the pupils themselves for the purposes of the verifications in object.

5. Source of personal data

The personal data processed will be submitted directly by the pupils for control purposes, either digitally or on paper.

The data must be submitted daily for control purposes, for ten days after the two positive cases have been detected in the class.

6. Processing methods

The data will be displayed for control purposes and will not be recorded, saved or stored under any circumstances.

The verification of the requirements will be carried out by the School Director or by staff of the School specifically identified by the School Director and will take place in such a way as to guarantee the confidentiality of the pupil concerned.

7. Recipients of data communication

The personal data, processed solely for the achievement of the verification purposes indicated above, will not be communicated by the Owner to third parties.

8. Transfer of personal data to third countries or international organisations

There are no transfers of personal data to third countries (outside the EU) or international organisations.

9. Period of retention of personal data

In compliance with Article 5(1)(e) of EU Regulation No. 679/2016, in order to ensure correct and transparent processing, no personal data of the pupils subject to verification will be stored.

10. Rights of the persons concerned

In compliance with Articles 15 et seq. of the GDPR, data subjects have the possibility to exercise the rights provided for by the legislation, in the following forms and ways. In particular, it may be exercised:

- a) the right of access (Art. 15), i.e. to obtain in particular:
 - the confirmation of the existence of personal data
 - the indication of the origin and categories of personal data, the purpose and method of their processing

- the logic applied in the processing carried out with the aid of electronic instruments;
 - the identity of the Owner of the personal data, the Data Protection Officer and the subjects or categories of subjects to whom the data have been or may be communicated;
 - the storage period;
- b) the right of rectification (art. 16);
- c) the right to cancellation (art. 17);
- d) the right to restriction of processing (art. 18).

In relation to the processing of personal data, you may contact the Owner of the processing to exercise your rights.

11. Right of complaint

In the event that the data subjects consider that the processing of personal data relating to them is carried out in breach of the provisions of EU Regulation 679/2016, they have the right to lodge a complaint with the Guarantor, as provided for in Article 77 of EU Regulation 679/2016 itself, or to take legal action in accordance with Article 79 of EU Regulation 679/2016.

12. Automated decision-making

There is no automated decision-making within the meaning of Article 14(2)(g) of Regulation (EU) 679/2016.