

## **Information pursuant to art. 13 of the EU Regulation 2016/679 (GDPR) on the processing of data related to distance learning activities**

This information is provided pursuant to Article 13 of EU Regulation 2016/679, also known as GDPR.

### **Data Controller**

The data controller is the Institute as a whole, legally represented by the School Headmaster. The contact details of the owner are made explicit in the header of this document.

### **Purpose of treatment and type of processed data**

Personal data are processed by the holder for the performance of institutional functions of the institution, which consist in providing a public service of education in the manner provided by applicable laws and regulations, and in carrying out related activities. In particular, this information relates to the processing of data related to distance learning activities. The main types of data processed are as follows: access credentials to the distance learning platform, IP address of connection, photographic and film footage of participants in the distance learning session, questions and answers to questions, voice comments, comments via chat, any grades awarded by the teacher.

### **Legal basis of the treatment**

Schools and universities are authorized to process data, including data relating to special categories, of teachers, pupils (including minors), parents and students, functional to the teaching and training activities in the school, vocational, higher or university, pursuant to art. 6, par. 1, lett. e), 3, lett. b) and 9, par. 2, lett. g) of the GDPR and Articles. 2-ter and 2-sexies of the Code for the protection of personal data. Pursuant to art. 1 of Measure 26/03/2020 of the Guarantor for the protection of personal data, the treatment can be carried out without the consent of the person concerned.

### **Compulsory or optional nature of data conferment and consequences of failure to provide data**

The provision of data by the person concerned is mandatory in order to provide or to take advantage of the service of distance learning. Failure to provide data will make it impossible to use the distance learning services.

Under Article. 1 of Measure 26/03/2020 of the Guarantor for the protection of personal data, the treatment can be done without the consent of the person concerned.

### **Scope of data communication**

The carrying out of the processing operations implies that the data may be communicated or brought to the attention of subjects external to the entity, who may act in a regime of autonomous ownership or be designated as data processors.

The personal data collected are also processed by the personnel of the data controller, who act on the basis of specific instructions provided regarding the purposes and methods of processing.

In particular, with regard to the activities of distance learning, personal data (including photographic or filming) of participants, may be brought to the attention of each of the other participants in the distance learning session.

The data provided may be communicated to third parties with whom there are contracts or agreements for services aimed at the use of the services themselves.

On the occasion of the use of certain educational platforms (the best known GSuite for Education; Microsoft Education), the data may be transferred to the USA, insofar as the platform manager has adopted guarantee mechanisms such as BCR - Binding Corporate Rules or has adhered to specific protocols (e.g. Privacy Shield, Standard Contractual Clauses).

### **Data Retention Time**

The data will be stored according to the technical rules on digital storage of documents defined by AGID and in the time and manner indicated by the Guidelines for educational institutions and the plans for storage and discarding of school archives defined by the General Directorate of Archives at the Ministry of Culture, and in any case for a period not exceeding that which is indispensable for the pursuit of the purposes.

### **Data Protection Officer**

The Data Protection Officer (DPO) is \_\_\_\_\_ based in \_\_\_\_\_, can be reached at (e-mail) \_\_\_\_\_ or at (mobile number) \_\_\_\_\_.

### **Rights of the interested parties**

The interested parties have the right to obtain from the owner, in the cases provided for, access to personal data and the correction or deletion of the same or the limitation of the treatment that concerns them or to oppose the treatment (art. 15 and ss. of the Regulation).

The appropriate request is made by contacting the Data Protection Officer \_\_\_\_\_ email -----  
cell. \_\_\_\_\_

## **Right to complain**

Interested subjects who believe that the processing of their personal data is in breach of the provisions of the GDPR have the right to lodge a complaint with the Guarantor, as provided for by art. 77 of the Regulation itself, or to take legal action (art. 79 of the Regulation)).

## **RULES OF CONDUCT**

Teachers, students and parents are reminded that even in the context of distance learning activities they are required to comply with the rules on privacy and the following rules of conduct. Teachers, students and families therefore undertake to:

- to keep safe and secret the personal password for access to the distance learning platform, and not to allow other people to use it;
- to immediately communicate by email to the Institute the impossibility to access their account, the suspicion that others may access it, and episodes such as loss or theft of the password;
- not allow others, for any reason, to use the distance learning platform (e.g. Google Suite for Education);
- not disclose any confidential information of which he/she may become aware concerning the activities of other people using the service;
- to comply with these rules of conduct, under penalty of suspension by the Institute of the Student's personal account and exclusion from distance learning activities and related projects;
- to use the services offered only for the exclusive use of the didactic activities of the School;
- not to disseminate on the network the activities carried out by the teacher, with the teacher and his/her classmates;
- not disseminate online screenshots or photographs or film footage relating to distance learning activities.

The teacher, the student and his family assume full responsibility for all data submitted, created and managed through the distance learning platform.

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