



## PRIVACY

Cagliari, the 21/10/2021

Chatterbox Srl - in the person of the legal representative Tessa Carla Maria Percopo - based in Cagliari in Via Tempio 15, manager of the Chatterbox English School and the Primary State school and as a provider of the secondary parental education service and all services connected and instrumental to those of education, including related commercial services, in their position as owner of the processing of personal data pursuant to articles 4 and 28 of Legislative Decree no. 196 of 30 June 2003 (hereinafter also Code) and articles 4, n. 7 and 24 of EU Regulation 2016/679 of 27 April 2016 (hereinafter also Regulation) relating to the protection of personal data,

Informs you

- pursuant to Article 13 of the Code and Art. 13 of the regulation - which will process personal data relating to physical people for the purposes and in the manner indicated below

### TREATMENT

Processing of personal data means any operation or set of operations, applied to personal data or set of personal data, even if not recorded in a database, such as collection, registration, organization, structuring, storage, processing, selection, blocking, adaptation, modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, erasure and destruction.

The processing will be carried out manually (collection of paper forms) and electronically or in any case with the help of computerized and automated tools according to the Code and the European Regulation indicated.

This treatment will be based on principles of correctness, lawfulness and transparency and protection of your privacy and your rights with the adoption of the technical security measures required by law that will affect the processing of your data starting from the collection, use, communication and storage.

Pursuant to art. 13 of the Code and the Regulation, we therefore form the following information:

#### A) SOURCE OF PERSONAL DATA SUBJECT TO PROCESSING and Methods of data collection

The personal data being processed may be collected in person through a paper form and/or through an online digital form on the occasion of live and/or digital marketing campaigns on the official website of the school and/or on the official Chatterbox social media pages, also through sponsored paid campaigns (for example, following the provision of free educational material downloadable from the internet). More precisely, they will be processed by the staff of the marketing office appointed for this purpose, in the phases of advertising offers, events and commercial news, as well as during the relations of the Company Chatterbox with customers and potential customers concerned. When the data is collected digitally, the collection will be through the Mail Chimp platform, for information on the processing of personal data please refer to the website <https://mailchimp.com/legal/privacy/>.

Mail Chimp is an online marketing platform operated by The Rocket Science Group LLC, a company based in the State of Georgia, United States.

With regard to citizens of the European Union, Mail Chimp bases the legal basis for the collection and processing of users' personal data on legitimate interest. It includes the ability to augment, maintain and provide technological products and services; and ensures the security of the services offered and marketing activities. In the cases prescribed by law, Mail Chimp collects personal information of users only upon giving consent.

Mail Chimp adheres to and certifies its compliance with the EU-U.S. Privacy Shield Framework. In this regard, it undertakes to manage personal data from citizens of the European Union in accordance with the certification schemes dictated by the Privacy Shield Framework. More information about the Privacy Shield Framework is available at the following link <https://www.privacyshield.gov/welcome>.

With respect to personal data received or transferred in accordance with the Privacy Shield Frameworks, Mail Chimp is also subject



to the control of the United States Federal Trade Commission. In specific cases, Mail Chimp may be required to disclose personal information in response to requests legitimately made by Public Authorities, determined by the need to ensure national security or the obligation to comply with the laws of the United States.

Mail Chimp declares it adopts appropriate and adequate security measures, both technical and organizational, it protects personal data from loss, misuse, unauthorized access, illicit dissemination, alteration and destruction, having assessed the risks related to the processing activities and the nature of the personal data managed. Further information on security practices can be found at the following link <https://mailchimp.com/about/security/>

Interested parties can obtain a copy of the personal data processed by Mail Chimp through the following contact channel <https://mailchimp.com/contact/>.

#### B) PURPOSE OF THE PROCESSING AND LEGAL BASIS OF THE PROCESSING

The processing of personal data provided by them (common) and processed by the company's staff appointed for this purpose is functional and aimed at inclusion in the list of contacts and/or in the mailing list of Chatterbox on the Mailchimp platform for sending communications and advertising and informative material by telephone or e-mail. **The legal basis of the processing is the legitimate interest of the data controller pursuant to Article 6, paragraph 1 letter f) GDPR and the consent of the interested party.**

#### C) OPTIONAL or MANDATORY CONSENT

The communication of personal data is optional and consent can be revoked at any time in the manner specified below. Consent, therefore, is not a legal obligation, but a necessary requirement for the provision by Chatterbox of free educational material downloadable from the internet. The interested party voluntarily provides personal data to receive commercial communications from Chatterbox, aware of being able to request the unsubscribing from the mailing list at any time through the link at the bottom of the page in any e-mail communication received from the company or through direct communication to Chatterbox.

#### D) COMMUNICATION AND DISSEMINATION OF PERSONAL DATA FOR THE PURSUIT OF THE PRIMARY PURPOSES OF THE PROCESSING

The data will be managed exclusively by Chatterbox and will not be disclosed to third parties.

#### E) DATA RETENTION TIMES and Security Measures

The data will be kept for a period of three years. Appropriate security measures are observed to prevent the loss of data, illicit or incorrect use and unauthorized access.

#### F) OWNER AND CONTACT PERSON OF THE DATA

- The Data Controller is Chatterbox Srl, with registered office in Cagliari, via Tempio, 15, in the person of the legal representative Tessa Carla Maria Percopo e-mail: [tessa.percopo@chatterboxschools.co.uk](mailto:tessa.percopo@chatterboxschools.co.uk) Mobile: 3387740155
- The contact person for data management is Bronya Sykes. E-mail: [bronya.sykes@chatterboxschools.co.uk](mailto:bronya.sykes@chatterboxschools.co.uk) Mobile: 3357082421
- The company that deals with the management and care of the security of computer systems is Officine Informatique di Collu Gian Claudio – via Roma 42 – 09026 San Sperate, in the person of the owner, Collu Gian Claudio.

#### EXERCISE OF RIGHTS BY THE INTERESTED PARTY

At any time the interested party may exercise his rights towards the data controller, Chatterbox s.r.l., as provided in Article 7 of the Code regarding the protection of personal data; or the interested party has the right to obtain confirmation of the existence or otherwise of personal data and, where appropriate, their communication in an intelligible form; updating, rectification or, when interested, integration of data; cancellation, transformation into anonymous form or blocking of data; as well as the right to object, in whole or in part, for legitimate reasons to the processing of personal data concerning them, even if pertinent to the purpose of the collection, or to the processing of personal data concerning them for the purpose of sending advertising material or direct sales or for carrying out market research or commercial communication, and in particular as provided for by the Regulation the interested party has the right:

- access to personal data;
- to obtain the correction or cancellation of the same or the limitation of the processing concerning him;



- to oppose the processing;
- data portability;
- to revoke the consent (the information to be given to the interested party about the right to withdraw consent obviously cannot concern cases in which the processing, for example, necessary to fulfil a legal obligation to which the data controller is subject or for the execution of a task of public interest or connected to the exercise of public powers to which the data controller is invested);
- to lodge a complaint with the supervisory authority (Privacy Officer).

The rules mentioned in full are reproduced below for convenience

*"PRIVACY CODE Art. 7 Right of access to personal data and other rights*

*1. The interested party has the right to obtain confirmation of the existence or not of personal data concerning them, even if not yet registered, and their communication in an intelligible form.*

*2. The interested party has the right to obtain the indication of:*

*a) the origin of the personal data;*

*b) the purposes and methods of processing;*

*c) the logic applied in case of processing carried out with the aid of electronic instruments;*

*d) the identification details of the owner, managers and designated representative pursuant to Article 5, paragraph 2;*

*e) the subjects or categories of subjects to whom the personal data may be communicated or who can learn about them as appointed representative in the territory of the State, managers or agents.*

*3. The interested party has the right to obtain the:*

*a) updating, rectification or, when interested, integration of data;*

*b) cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed;*

*c) attestation that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case in which this fulfilment proves impossible or involves a use of means manifestly disproportionate to the protected right.*

*4. The interested party has the right to object, in whole or in part:*

*a) for legitimate reasons, to the processing of personal data concerning them, even if pertinent to the purpose of the collection;*

*b) to the processing of personal data concerning them for the purpose of sending advertising material or direct sales or for carrying out market research or commercial communication".*

*"EUROPEAN REGULATION Article 15*

*Right of access of the interested party*

*1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning them are being processed and, if so, to obtain access to the personal data and the following information:*

*a) the purposes of the processing;*

*b) the categories of personal data concerned;*



- c) *the recipients or categories of recipients to whom the personal data have been or will be communicated, in particular if recipients of third countries or international organizations;*
- d) *when possible, the envisaged retention period of the personal data or, if this is not possible, the criteria used to determine that period;*
- e) *the existence of the right of the interested party to ask the data controller to rectify or delete personal data or to limit the processing of personal data concerning them or to oppose their processing;*
- f) *the right to lodge a complaint with a supervisory authority;*
- g) *if the data are not collected from the data subject, all available information on their origin;*
- h) *the existence of an automated decision-making process, including profiling referred to in Article 22(1) and (4), and, at least in such cases, meaningful information on the logic used, as well as the importance and expected consequences of such processing for the data subject.*

*Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the existence of appropriate safeguards pursuant to Article 46 relating to the transfer.*

*3. The controller shall provide a copy of the personal data being processed. In the event of further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject submits the request by electronic means, and unless otherwise indicated by the data subject, the information shall be provided in a commonly used electronic format.*

*4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.*

#### *Article 16*

##### *Right to rectification*

*The interested party has the right to obtain from the data controller the correction of inaccurate personal data concerning them without undue delay. Taking into account the purposes of the processing, the data subject has the right to obtain the integration of incomplete personal data, including by providing a supplementary statement.*

#### *Article 17*

##### *Right to erasure*

*1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning them without undue delay and the controller shall be obliged to erase personal data without undue delay, if one of the following reasons exists:*

- a) *the personal data are no longer necessary with respect to the purposes for which they were collected or otherwise processed;*
- b) *the data subject withdraws the consent on which the processing is based in accordance with point (a) of Article 6(1) or point (a) of Article 9(2) and if there is no other legal basis for the processing;*
- c) *the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or opposes the processing pursuant to Article 21(2);*



- d) *the personal data have been processed unlawfully;*
- e) *the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject;*
- f) *the personal data have been collected in relation to the offer of information society services referred to in Article 8(1).*

*2. Where the controller has made personal data public and is obliged, pursuant to paragraph 1, to erase them, taking into account available technology and the costs of implementation, it shall take reasonable steps, including technical measures, to inform the controllers who are processing the personal data of the data subject's request to delete any link, copying or reproduction of your personal data.*

*3. Paragraphs 1 and 2 shall not apply to the extent that the processing is necessary:*

- a) *for the exercise of the right to freedom of expression and information;*
- b) *for the fulfilment of a legal obligation requiring processing under Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;*
- c) *for reasons of public interest in the field of public health in accordance with points (h) and (i) of Article 9(2) and Article 9(3);*
- d) *for the purposes of archiving in the public interest, for scientific or historical research or for statistical purposes in accordance with Article 89(1), in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of such processing; or*
- e) *for the assessment, exercise or defence of a right in court.*

#### *Article 18*

##### *Right to restriction of processing*

*1. The interested party has the right to obtain from the data controller the limitation of the processing when one of the following hypotheses occurs:*

- a) *the data subject disputes the accuracy of the personal data, for the period necessary for the data controller to verify the accuracy of such personal data;*
- b) *the processing is unlawful and the data subject opposes the erasure of the personal data and requests instead that their use be restricted;*
- c) *although the data controller no longer needs it for the purposes of the processing, the personal data are necessary for the data subject to ascertain, exercise or defend a right in court;*
- d) *the data subject has objected to the processing pursuant to Article 21(1), pending verification of the possible prevalence of the legitimate grounds of the data controller over those of the data subject.*

*2. Where processing is restricted in accordance with paragraph 1, such personal data shall be processed, except for storage, only with the consent of the data subject or for the establishment, exercise or defence of a right in court or to protect the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.*



3. The data subject who has obtained the restriction of processing pursuant to paragraph 1 shall be informed by the controller before that restriction is lifted.

#### Article 19

##### *Obligation to notify in case of rectification or erasure of personal data or restriction of processing*

The controller shall inform each of the recipients to whom the personal data have been transmitted of any corrections or erasures or restrictions on processing carried out in accordance with Articles 16, 17(1) and 18, unless this proves impossible or involves a disproportionate effort. The data controller shall notify the data subject of these recipients if the data subject so requests.

#### Article 20

##### *Right to data portability*

1. The data subject shall have the right to receive in a structured, commonly used and machine-readable format the personal data concerning him or her provided to a controller and shall have the right to transmit such data to another controller without hindrance from the controller to whom he or she has provided them where:

- a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and
- b) the processing is carried out by automated means.

2. When exercising his or her rights with regard to data portability pursuant to paragraph 1, the data subject shall have the right to obtain the direct transmission of personal data from one controller to another, where technically feasible.

3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. This right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

#### Section 4

##### *Right to object and automated decision-making process relating to natural persons*

#### Article 21

##### *Right to object*

1. The data subject shall have the right to object at any time, on grounds relating to their particular situation, to the processing of personal data concerning them pursuant to Article 6(1)(e) or (f), including profiling on the basis of those provisions. The data controller refrains from further processing personal data unless he demonstrates the existence of compelling legitimate reasons to proceed with the processing that prevail over the interests, rights and freedoms of the interested party or for the assessment, exercise or defence of a right in court.

2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning them carried out for such purposes, including profiling to the extent that it is related to such direct marketing.



3. Where the data subject objects to the processing for direct marketing purposes, the personal data shall no longer be processed for those purposes.

4. The right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information at the latest at the time of the first communication with the data subject.

5. In the context of the use of information society services and without prejudice to Directive 2002/58/EC, the data subject may exercise their right to object by automated means using technical specifications.

6. Where personal data are processed for scientific or historical research purposes or for statistical purposes pursuant to Article 89(1), the data subject shall, on grounds relating to their particular situation, have the right to object to the processing of personal data concerning them, unless the processing is necessary for the performance of a task carried out in the public interest.

#### *SENSITIVE DATA*

Personal data defined as "sensitive data" or as "judicial data" by the Code and art. 9 of the Regulation will be processed exclusively by the staff of the school, specifically appointed, in accordance with the provisions of the law and regulation and in compliance with the principle of strict indispensability of the treatments. We remind you that sensitive data are those personal data "suitable for revealing racial and ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or organizations of a religious, philosophical, political or trade union nature, as well as personal data suitable for revealing the state of health and sexual life". Judicial data are those personal data suitable for revealing measures referred to in Article 3, paragraph 1, letters a) to o) and r) to u), of Presidential Decree 14 November 2002, n. 313, regarding criminal records, the registry of administrative sanctions dependent on crime and related pending charges, or the status of accused or suspect pursuant to articles 60 and 61 of the Code of Criminal Procedure.

#### Article 9 of the European Regulation

#### Processing of special categories of personal data

1. It shall be prohibited to process personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as to process genetic data, biometric data intended to uniquely identify a natural person, data relating to the health or sex life or sexual orientation of the person.

2. Paragraph 1 shall not apply where one of the following applies:

.. OMITTED...

- the processing is necessary for reasons of overriding public interest on the basis of Union or Member State law, which must be proportionate to the purpose pursued, respect the essence of the right to data protection and provide for appropriate and specific measures to protect the fundamental rights and interests of the data subject;
- the processing is necessary for archiving purposes in the public interest, for scientific or historical research or for statistical purposes in accordance with Article 89(1), on the basis of Union or national law, which is proportionate to the purpose pursued, respects the essence of the right to data protection and provides for appropriate and specific measures to protect the fundamental rights and interests of the data subject.

Please note that for further information and clarifications, or to signal the desire not to adhere to certain initiatives or services among those indicated in this document, you can contact the contact person for the processing of personal data of the school.



The data controller

Chatterbox s.r.l.