



## POLICY

Cagliari, \_\_\_\_\_

Dear Sir/Madam \_\_\_\_\_

Parent/ (Legal guardian) of the Student \_\_\_\_\_

Chatterbox Srl - in the person of the legal representative Tessa Carla Maria Percopo - based in the Cagliari Via Tempio 15 school site, manager of the Chatterbox English School Playschool and of the Ministry recognised Primary School and as the supplier of the Secondary parental education service and of all services connected and instrumental to those of education, in her position as proprietor of the personal data processing pursuant to article 4 and 28 of the D.Lgs. n. 196 of the 30 June 2003 (hereafter also the code) and articles 4, n. 7 and 24 of the EU Regulation 2016/679 of the 27 April 2016 (hereafter also the regulation) relating to the protection of personal data,

informs you:

- Pursuant to art 13 of the code and art 13 of the regulation - which will proceed to the processing of personal data referring to physical people (minors/parents/guardian/people exercising parental responsibility in general) for the purpose and with the means indicated below.

### HANDLING

Handling of personal data is intended as any operation or set of operations, applied to personal data or set of personal data, even if not registered in a database, such as the collection, registration, organisation, 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, cancellation and destruction.

The handling will be carried out manually (collection of paper forms) and electronically or in any case with the aid of computerised and automated tools according to the Code, and the European Regulation indicated. The handling will be based on principles of correctness, lawfulness and transparency and the protection of your privacy and your rights with the adoption of the technical security measures required by the law that will inform the handling of your data starting from the collection, use, communication and storage.

Pursuant to Art 13 of the Code and the Regulation, we, therefore, provide the following information:

#### A) SOURCE OF PERSONAL DATA OBJECT OF THE HANDLING

The personal data being handled may be collected as part of the pupil's enrolment procedures and the stipulation and management of the school performance contract. More precisely, they will be collected by the school staff appointed for this purpose, in the phases identified by the Decree of the 07/12/2006 n. 3025 of the Ministry of Public Education during the start of the school year preparatory activities (filling in the registration forms), during the training phase and the meeting of the collegial bodies, during the relations and the school - family rapports and during the educational and didactic phase, directly from the interested parties, parents, guardians and parental responsibility practitioners of the pupils.

#### B) PURPOSE OF THE HANDLING



The personal data provided by you (common, sensitive and judicial) and handled by the school staff appointed for this purpose is functional to the achievement of the institutional purposes of education and training within the school environment, and all the activities related to their institutional and instrumental functions, with particular reference to those, also carried out in integrated form and is therefore of significant public interest, pursuant to art 20 and 21 of the Legislative Decree 196/2003 (Code) and art 9 letter G. of the European Regulation which in the presence of this purpose also allows the handling of particular data categories such as sensitive data.

Following school enrolment, parents and those exercising parental responsibility may have the opportunity to use online services reserved for a member, available on the school's official website or on dedicated platforms (e.g. ARGO or other software for managing and communicating of student's personal data). The access to and the surfing of restricted areas will be only allowed upon registration by making a request to the data controller. The registration process consists of the attribution of credential authentication by the company with which then the user (parent/person exercising parental responsibility) will be able to access the areas and services reserved for registered users.

Therefore, further purposes of the handling are represented by the need to allow the completion of the previously mentioned requests for the procedure after online registration and are strictly linked to the institutional function and the management of the school performance contract provided. The institution will collect email addresses of parents, guardians and holders of parental responsibility for the purpose of communicating news relating to the institution activities via emails or periodic newsletters.

#### C) OPTIONAL OR COMPULSORY CONSENT

The communication of personal data is a legal obligation and a necessary requirement for the registration and the conclusion and management of the school performance contract, and the interested party has the responsibility to provide personal data under penalty of non-registration and non-stipulation of the school service contract and the impossibility of providing the related services.

#### D) COMMUNICATION AND DIFFUSION OF PERSONAL DATA FOR THE PURSUIT OF THE PRIMARY PURPOSES OF THE HANDLING

The data will be communicated to public entities (such as ASL, Municipality, Province, Regional School Office and Territorial Areas, judicial police bodies, tax police bodies, financial police, judiciary, and to accounting and legal consulting firms) within the limits of the provisions of the current laws and regulation statements and the consequent obligations for the school; the data relating to the pupil's school results may be published by being posted in the school register in accordance with the current subject provisions; the data provided may be disclosed to third parties who provide services to this institution such as travel agencies and accommodation facilities (exclusively concerning school trips, educational trips and school camps), insurance companies (in relation to accident insurance policies), any companies supplying other services (such as canteen services). Some data will also be communicated to museums regarding exhibitions and the 'open monument' event, to English, French, and Chinese schools where the pupils will be carrying out their educationally required exams. The implementation of this handling is a necessary condition for the interested party to use the related services.

#### E) DATA STORAGE TIMES

The data will be stored for the time defined by the reference educational institution's legislation, except for the ten-year term for documents relating to civil, accounting and tax data.

#### F) HOLDER AND CONTACT PERSON OF THE HANDLING

- The data holder is Chatterbox s.r.l., with registered office in Cagliari, via Tempio, 15, and the legal person representative, Tessa Carla Maria Percopo email: [tessa.percopo@chatterboxschools.co.uk](mailto:tessa.percopo@chatterboxschools.co.uk) mob n. 3387740155
- The contact person for the management of data is Dr Bronya Sykes email: [bronya.sykes@chatterboxschools.co.uk](mailto:bronya.sykes@chatterboxschools.co.uk) mob n. 3357082421



- The company that deals with the IT systems' management and security is the Oficine Informatique of Collu Gian Claudio – Via Roma 42 – 09026 San Sperate, ownership of Collu Gian Claudio.

### ONLINE COMMUNICATION - through the Facebook group

To facilitate institutional communication and school/family communication, the school will use – alongside the traditional communication via email that will continue to operate – a closed Facebook group hosted by the page: Gruppo Chatterbox World. The group, which has a closed privacy profile, allows registration and access only to parents/exercisers of parental responsibility and school staff (Property, Employees and External Collaborators) who will request it to the group administrator named Ms Bronya Sykes email: [bronya.sykes@chatterboxschools.co.uk](mailto:bronya.sykes@chatterboxschools.co.uk) tel. 3357082421

To access the group, you must be registered on the Facebook social network and consequently have a Facebook account from which to request the group administrator's authorisation to be allowed access to the group.

The group's privacy settings only allow the publication of posts authorised by the group administrator; in any case, the posts will never contain sensitive or judicial data of anyone, while they may include personal data (never of identifying aspects of minors) only of group participants in order to allow any opposition to the data handling promptly.

The posts may not contain photos/videos that allow minors' identification, under penalty of non-publication. Any personal data that will never be of sensitive and judicial data nature, published within the group, and collected from the interested parties, with the publication will be communicated to the social network 'Facebook' and will be stored through the group's publication for the time necessary for the school's communications, and in any case, all personal data published on the group page will be removed by the institution upon the termination of the school performance contract or upon immediate request of the interested party, according to Facebook's rights on the current data.

Within the group, school activity photos may be published, but children will never be clearly filmed and in such a way as to be identifiable through the images of photos or videos. The communication of data conducted through the Facebook group registration is not mandatory and does not involve any limitations to the stipulation and management of the school contract; the interested parties will have the right to oppose the handling of such data at any time. The data published on the Facebook group will still be subject to the same rules, purposes and processing methods indicated in paragraph A, B, D, E, F, except for the mandatory consent referred to in paragraph C.

### EXERCISE OF RIGHTS BY THE INTERESTED PARTY

At any time, the interested party may exercise their rights towards the data holder, Chatterbox s.r.l., as stated by art. 7. Of the Code regarding the protection of personal data; the interested party has the right to obtain confirmation of the existence or otherwise of the personal data and if necessary, 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 their personal data, even if pertinent to the purpose of collection, or the processing of personal data concerning them for the purpose of sending advertising or sales material directly or for carrying out market research or commercial communication, and in particular as required by the Regulations the interested party has the right:



- to access to personal data;
- to obtain the correction or cancellation of these or the limitation of the processing that concerns them;
- to oppose the handling;
- to data portability;
- to withdraw consent (the information to be returned to the interested party regarding the right to withdraw consent obviously cannot concern the cases in which the handling, for example, is necessary to fulfil a legal obligation to which the data provider is subject or to the execution of a public interest task or connected to public authority exercises vested in the data provider;
- to lodge a complaint with the supervisory authority (Privacy Guarantor)

The rules cited in full are reproduced for convenience below

***“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 recorded, and the communication of these in an intelligible form.*

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

*a) the origin of the personal data;*

*b) the purposes and methods of handling;*

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

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

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

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

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

*b) the cancellation, transformation into anonymous form or blocking of data handled in violation of the law, including those that did not need to be kept for the purposes for which the data was collected or subsequently handled;*

*c) the attestation that the operations referred to in letters a) and b) have been brought to the attention, as it also regards their content, of those to whom the data has been communicated or disseminated, except in the case in which this fulfilment proves impossible or involves a use of means that are 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 handling of personal data concerning them, even if pertinent to the collection purposes;*

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

***“EUROPEAN REGULATION Article 15;***

***Rights of access by the interested party***

*1. The interested party has the right to obtain from the data holder confirmation as to whether or not personal data concerning them is being handled and, in such case, to obtain access to the personal data and the following information:*

*a) The purpose of the handling;*

*b) The categories of personal data in question;*

*c) The recipients or categories of recipient to whom the personal data has been or will be disclosed, in particular if they are third country or international organisation recipients;*

*d) When possible, the expected retention period of personal data or, if not possible, the criteria used to determine such period;*



- e) *The existence of the right of the interested party to ask the data holder to rectify or delete personal data or limit the handling of data concerning them or to oppose their handling;*
- f) *The right to lodge a complaint with a supervisory authority;*
- g) *If the data is not collected from the data subject, all available information on its origin;*
- h) *The existence of an automated decision-making process, including the profiling referred to in art. 22. Paragraph 1 and 4, and, at least in such cases, significant information on the logic used, as well as the importance and expected consequences of such handling for the interested party;*

*If personal data is transferred to a third country or an international organisation, the interested party has the right to be informed of adequate guarantees pursuant to Art. 46 relating to the transfer.*

- 3. *The data holder provides a copy of the personal data being handled. In case of further copies requested by the interested party, the data holder may charge a reasonable fee based on administrative costs. If the interested party submits a request electronically, and unless otherwise indicated the information will be provided in a commonly used electronic format.*
- 4. *The right to obtain a copy referred to in paragraph 3 must not affect others' rights and freedoms.*

#### Article 16

##### *Right of Rectification*

*The interested party has the right to obtain the correction of inaccurate personal data concerning them without unreasonable delay from the data holder. Considering the purposes of the handling, the interested party has the right to obtain the integrations if incomplete personal data and provide an additional declaration.*

#### Article 17

##### *Right of cancellation ("right to be forgotten")*

- 1. *The interested party has the right to obtain from the data holder the cancellation of personal data concerning them without unreasonable delay, and the data holder is obliged to cancel the personal data without undue delay if one of the following reasons exist:*
  - a) *The personal data is no longer necessary with respect to the purposes for which they were collected or otherwise handled;*
  - b) *The interested party revokes the consent on which the handling is based in accordance with art. 6, paragraph 1, letter a), or art. 9, paragraph 2, letter a), and if there is no other legal basis for the handling;*
  - c) *The interested party opposes the handling pursuant to Art. 21, paragraph 1, and there is no legitimate overriding reason to proceed with the handling, or opposes the handling pursuant to Art 21, paragraph 2;*
  - d) *The personal data has been unlawfully handled;*
  - e) *The personal data must be deleted to fulfil a legal obligation under the Union or State law member of which the data holder is subject to;*
  - f) *The personal data has been collected in relation to the offer of information of the society services referred to in Art. 8, paragraph 1;*

- 2. *If the data holder has made personal data public and is obliged, pursuant to paragraph 1, to delete them, taking into account the available technology and the implementation costs, it adopts reasonable measures, including technical ones, to inform the data*

Privacy Policy for Families – Chatterbox s.r.l.



holder that they are handling the requested personal data of the interested party to delete any link, copy or reproduction of their personal data.

3. Paragraphs 1 and 2 do not apply to the extent that handling is necessary:

- a) To exercise the right to freedom of expression and information;
- b) For the fulfilment of a legal obligation that requires the handling expected by the law of the Union or the State member to which the data holder is subject to or for the performance of a task carried out in the public interest or in the exercise of public authority vested in the data holder;
- c) For reasons of public interest in the field of public health in accordance with Art. 9, paragraph 2, letters h) and i), and of Art. 9. Paragraph 3;
- d) For public interest archiving purposes, for scientific or historical research or for statistical purposes in accordance with Art. 89, paragraph 1, so far as the right referred to in paragraph 1 is likely to render impossible or seriously prejudice the achievement of the handling objective;
- e) For the assessment, exercise of defence of a right in court;

Article 18

Right to handling limitation

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

- a) The interested party disputed the accuracy of the personal data, for the period necessary for the data holder to verify the accuracy of such data;
- b) The handling is unlawful and the interested party opposed the cancellation of personal data and requests instead that its use be limited;
- c) Although the data holder no longer needs it for handling purposes, the personal data is necessary for the interested party to ascertain, exercise or defend a right in court;
- d) The interested party is opposed to the handling pursuant to Art. 21, paragraph 1, pending verification of the possible prevalence of the legitimate reasons of the data holder with respect to those of the interested party;

2. If the processing is limited pursuant to paragraph 1, such personal data is handled, except for storage, only with the consent of the interested party or for the assessment, exercise or defence of a right in court or in protecting the rights of another physical or legal person or for reasons of significant public interest of the Union or a member State.

3. The interested party who has obtained the handling limitation pursuant to paragraph 1 is informed by the data holder before the limitation is revoked.

Article 19

Obligation to notify in case of rectification or cancellation of personal data or handling limitation;

The data holder communicates to each of the recipients to whom the personal data has been transmitted any corrections or cancellations or handling limitations carried out pursuant to Art. 16, Art. 17, paragraph 1, and Art. 18, unless proves impossible or involves a disproportionate effort. The data holder informs the interested party of these recipients if they request such.



## Article 20

### Right to data portability

1. *The interested party has the right to receive in a structured format, commonly used and readable by an automatic device, the personal data concerning them provided to the data holder and has the right to transmit such data to another data holder without impediments from the current data holder if:*

- a) *The handling is based on consent pursuant to Art. 6, paragraph 1, letter a), or Art. 9, paragraph 2, letter a), or on a contract pursuant to Art. 6, paragraph 1, letter b);*
- b) *The handling is carried out by automated means;*

2. *In exercising their rights related to data portability pursuant to paragraph 1, the interested party has the right to obtain the direct transmission of personal data from one data holder to another, if technically feasible;*

3. *The exercise of the right referred to in paragraph 1 of this article is without prejudice to Art 17. This right does not apply to the handling necessary for the performance of a public interest task or connected to the exercise of public authority vested in the data holder.*

4. *The right referred to in paragraph 1 must not affect the rights and freedom of others.*

## Section 4

### Right of opposition and automated decision-making process relating to physical people

## Article 21

### Right of opposition

1. *The interested party has the right to object at any time, for reasons connected to his particular situation, to handling personal data concerning him pursuant to art. 6, paragraph 1, letters e) and f), including profiling based on these provisions. The data holder refrains from further handling personal data unless they demonstrate the existence of compelling legitimate reasons for handling the handling that prevails over the interests, rights, and freedoms of the data subject or for the assessment, exercise or defence of a right in court.*

2. *If personal data is handled for direct marketing purposes, the interested party has the right to object at any time to the processing of such data concerning the for these purposes, including profiling to the extent that its connected to such direct marketing.*

3. *If the person of interest objects to the handling for direct marketing purposes, the persona data is no longer handled for this purpose;*

4. *The right referred to in paragraphs 1 and 2 is explicitly brought to the attention of the interested party and is presented clearly and separately from any other information at the latest at the time of the first communication with them;*

5. *Regarding the use of social service information is conducted without prejudice towards the directive 2002/58/CE; the interested party may exercise his right to object by automated means using specific techniques;*

6. *If personal data is handled for scientific or historical research purposes or statistical purposes pursuant to Art. 89, paragraph 1, the interested party, for reasons connected to his particular situation, has the right to object to handling personal data that concerns them, except if the processing is necessary for the performance of a public interest task.*



### *SENSITIVE DATA*

Personal data defined as 'sensitive data' or 'judicial data' by the Code and by Art. 9 of the Regulations will be processed exclusively by the school staff, specifically appointed, in accordance with the expectations of the law and regulations and in compliance with the strictly essential handling principle. We remind you that sensitive data is personal data "with the potential of revealing racial and ethnic origin, religious, philosophical or other beliefs, political opinions, membership to parties, trade unions, associations or organisations of a religious nature, philosophical, political or trade union, as well as personal data revealing of the state of health and sexual life". Judicial data is personal data potential for disclosing provisions referred to in Art. 3, paragraph 1, letters from a) too) and from r) to u), of the Presidential Decree, 14 November 2002, n. 313, in the matter of criminal records, the register of administrative sanctions depending on the crime and the related pending charger, or the capacity of accused or suspected person pursuant to Art. 60 and 61 of the criminal procedure code.

Article 9 of the European Regulations

Handling of specific categories of personal data

1. It is forbidden to process personal data that reveals the 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 identify a physical person uniquely, data relating to the person's health or sexual life or orientation.

2. Paragraph 1 does not apply if one of the following occurs:

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- The handling is necessary for reasons of significant public interest on the basis of Union or State member 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 handling is necessary for public interest archiving purposes, for scientific or historical research or statistical purposes in accordance with Art. 89, paragraph 1, on the basis of the Union or National law, which is proportionate to the objective 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;

## **PHOTO AND VIDEO POLICY**

### **Concerning the photos and video images of minors, the following information is communicated**

It should be noted that it is possible that Chatterbox Srl, with legal representative Tessa Carla Maria Percopo, as the managing body of the Playschool and Primary School and as the provider of parental education service, in the context of educational and institutional activities will proceed via the staff in charge with taking and filming:

- Photos of didactic activities and work related to the school's institutional activities can be included in the Three-Year Plan of the Educational proposal.
- Video, by the school, of some didactic activities
- Images and photos of minors during the curricula didactic program (such as photos relating to lab activities, guided tours, award ceremonies, participation in sports competitions, etc.)
- Class photos

Given that:

- The photos could be published on the institution's website and the school blog.
- The photos could be put in children's notebooks or the end-of-year publication that the School produces to document the work done and pass on to the Municipality of other public and private bodies and institutions that they collaborate with.





- The images will be adequately stored on school premises and in the school server's archives, they will not be disseminated and only the school staff specifically appointed to the role will have access to them. The following information is provided:

#### SOURCE OF PHOTOS AND VIDEO IMAGES

The photos and video images containing minors will be collected exclusively by the staff appointed by the school as part of the institutional activity.

#### PURPOSE

The handling of photos and images is functional to the achievement of education and training in the school environment. The parental request of e-mail addresses and telephone numbers is necessary to explain this purpose and the communication by parents and operators to allow the communication of photos or authentication procedures to access the reserved areas of the site or blog where it will be possible to view the photos.

#### COMMUNICATION AND DIFFUSION OF PHOTOS

For transitional needs, as the section of the institution's blog is not yet ready (where photos of minors taken during school activities will be able to be viewed by parents upon authentication), the institution will process to send to the interested parents/ exercisers of parental responsibility, the photos and video images to the email addresses provided by the parents themselves in order to allow the most excellent possible control over the sending process. A further means of communication by the Institution of photos of the minor may occur through the use of a WhatsApp Business service on the number provided by parents and those with parental responsibility, for rapid communications dictated by contingent needs. We specify that the publication in clear text on the school website of photos of minors is permitted by the Privacy Law, as confirmed by the Privacy Guarantor, exclusively for institutional, educational and informational purposes, with respect for the principle of data minimization, and in any case families are informed that on the occasion of the publication of images and/or videos on the site, minors will only be portrayed in 'positive' moments (according to the terminology used by the Data Protection Authority and from the Treviso Chartered of the 5<sup>th</sup> October 1990 and subsequent additions) related to school life: learning, school plays, sports competitions, etc. In all cases, the photographs will never be associated with the child's name.

#### DATA HANDLING

The data will be handled both with IT tools (fixed and portable computers) and on paper media and any other type of suitable support and may be temporarily present on laptop Pcs or USB sticks of the teaching staff to prepare end-of-school documentation of children. Data handling will always be carried out in compliance with the minimum-security measures pursuant to the Technical Regulations on Minimum Security Measures, Annex B of the Consolidated Privacy Act, and the European provisions Regulation.

#### OPTIONAL OR COMPULSORY CONSENT

The consent of both parents/exercisers of parental responsibility, in accordance with the law on copyright, to the handling of personal identification data such as photos and videos, within limits specified above and for the purposes identified above, is a legal obligation and a necessary requirement for registration and conclusion of the school performance contract.

- PHOTOS AND IMAGES STORAGE TIMES

The photos and images, being related to institutional activity personal data, will be kept for the times defined by the educational institutions' referenced legislation.



• **HOLDER AND CONTACT PERSON OF THE HANDLING**

- The data holder is Chatterbox s.r.l., with registered office in Cagliari, via Tempio, 15, and the legal person representative, Tessa Carla Maria Percopo email: tessa.percopo@chatterboxschools.co.uk mob n. 3387740155
- The contact person for the management of personal data is Dr Bronya Sykes email: bronya.sykes@chatterboxschools.co.uk mob n. 3357082421
- The company that deals with the IT systems' management and security is the Officine Informatique of Collu Gian Claudio – Via Roma 42 – 09026 San Sperate, ownership of Collu Gian Claudio.

**EXERCISE OF RIGHTS BY THE INTERESTED PARTY**

The same rules in force for general personal data apply to photos and images of minors, i.e. the interested party may at any time exercise their right towards the data holder, Chatterbox s.r.l. (and of the data manager) as required by Art. 7 of the Code regarding the protection of personal data.

That is, the interested party has the right to obtain confirmation of the existence or not of personal data and, if necessary, 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 him, even if pertinent to the purpose of the collection, or to the handling of personal data concerning him for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication.

And in particular, as required by the Regulations, the interested party has the right:

- To access to personal data;
- To obtain the rectification or cancellation of such or the limitation of the handling concerning them
- To oppose the treatment
- To data portability
- To withdraw consent (the information to be provided to the interested party regarding the right to withdraw consent cannot concern the cases in which the handling, for example, is necessary to fulfil a legal obligation to which the data holder is subject or for the execution of public interest tasks or connected to exercise of the public authority vested by the data holder.
- To lodge a complaint with the supervisory authority (Privacy guarantor)

Please note that for further information and explanations, or to signal the desire to not adhere to certain initiatives or services among those indicated in this document, it is possible to contact the school's personal data handling representative.

The proprietor of the handling  
\_\_Chatterbox s.r.l.\_\_