

Privacy Policy Employees - Chatterbox s.r.l.



INFORMATION FOR THE PROCESSING OF PERSONAL DATA

Cagliari, _____ (date)

Dear _____ (name/surname)

In your capacity as employee/collaborator of the company Chatterbox Srl, we inform you that Chatterbox Srl, with registered office in Cagliari in Via Tempio 15, legal representative Tessa Carla Maria Percopo, in order to carry out its institutional functions and in particular to manage the employment relationship you have established with the company Chatterbox srl must acquire or already hold personal data concerning you, including those data that the Legislative Decree 196/2003 and now the European Regulation defines "sensitive and judicial data".

As part of her main activity as manager of the Chatterbox English School playschool and Chatterbox Primary School and as a provider of the secondary parental education service and of services connected and instrumental to educational services, in her 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 the Code) and articles 4, n. 7 and 24 of the EU Regulation 2016/679 of 27 April 2016 (hereinafter also the Regulation) concerning the protection of personal data, Chatterbox informs you that, pursuant to Article 13 of the code and art. 13 of the Regulations, it will proceed with processing of personal data referring to persons (employees and collaborators of the company in various capacities) for the purposes and with the methods indicated below.

PROCESSING

By processing personal data, we mean 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, 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, cancellation and destruction.

The processing will be carried out manually (collection of paper forms) and electronically or in any case with the aid of computerised and automated tools, by personnel in charge and by the company in charge that will take care of the maintenance of the server and of the private and owned devices that will be connected to the school server.

According to the Code and the European Regulation indicated, this process will be based on principles of correctness, lawfulness and transparency and protection of your privacy and your rights.

Pursuant to art. 13 of the Code and the Regulations, we therefore provide the following information:

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A) SOURCE OF PERSONAL DATA OBJECT OF THE TREATMENT

The personal, common, sensitive and judicial data being processed may be collected directly from the interested parties upon request from the company offices or from other public or private subjects for the application of the various institutions governed by the law and by the regulations on selection, recruitment, legal, economic, social security, pension management, staff updating and training, for the management of disputes and the establishment of disciplinary proceedings, to activate the collegiate bodies and institutional commissions provided for by the organizational rules of the Ministry of Education and of the school system as specified in the sheets attached to the Decree of 07/12/2006 n. 3025 of the Ministry of Public Education.

B) PURPOSE OF THE TREATMENT

The processing of personal data provided by you (sensitive and judicial municipalities) and processed by the school staff appointed for this purpose is functional to the achievement of the institutional purposes, in particular the collection and processing of data are necessary to fulfil the obligations and exercise specific rights of the data controller and of the interested party in the field of labour law as authorized by state legislation and by collective and individual contracts applied to employees, as well as by collaboration and consultancy contracts stipulated with collaborators. Being Chatterbox s.r.l. the manager of private schools supports this purpose also the public interest purpose pursued by operating the same within the Education and Training Education System.

Below is an exemplary list of the data processing of employees hired with a fixed-term and permanent employment contract or with a collaboration contract:

-HEALTH DATA.

The data relating to the state of health will be processed for the adoption of legal and economic measures, verification of suitability for the service, hiring of personnel belonging to the c. d. protected categories, benefits provided by the legislation on recruitment, maternity protection, hygiene and safety in the workplace, cause of service, fair compensation, honours, performance of compulsory and contractual insurance, pension and social security practices, welfare treatments, redemptions and social security reunions, reports of accidents and occupational diseases, use of absences, particular exemptions or work permits for staff and provisions, linked to particular health conditions of the person concerned or his family members, tax assistance, territorial and professional mobility and inter-compartmental use;

SENSITIVE DATA (POLITICAL ORIENTATION)

The data suitable for detecting membership in trade unions or trade union organizations will be processed for the obligations related to the payment of registration fees or the exercise of trade union rights;

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SENSITIVE DATA (RELIGIOUS BELIEFS)

Data on religious beliefs will be processed for the granting of permits for holidays subject to a specific request by the interested party for reasons of belonging to certain religious confessions. Data on religious convictions are also highlighted for the purpose of recruiting teachers of religion;

SENSITIVE DATA (PHILOSOPHICAL BELIEFS)

Data on philosophical or other beliefs will be processed as they may come out from the documentation related to the performance of military service as a conscientious objector.

SENSITIVE DATA (SEXUAL ORIENTATION)

Data relating to information on sexual life will be processed only in the event that they can only be inferred of any rectification of the attribution of sex.

JUDICIAL DATA

The data of a judicial nature will be processed in the case of bankruptcy procedures in order to assess the possession of the admission requirements and for the adoption of administrative and accounting measures related to legal matters involving the interested party;

ALSO

With regard to the management of litigation and disciplinary proceedings, it is specified that the following will be treated:

Sensitive and judicial data concerning all activities relating to the defence in court of the school in labour and administrative litigation as well as those related to the management of criminal and civil affairs.

Regarding the functioning of the collegiate bodies and institutional commissions, the following will be treated:

sensitive data (membership of trade unions) necessary to activate the collegiate bodies and institutional commissions provided for by the organizational rules of the Ministry of Education and the school system.

Regarding the management of the dispute between the school and the pupils' families:

sensitive and judicial data concerning all activities related to the defence in court of educational institutions of all levels, including boarding schools, day schools and special schools.

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We also inform you that the processing of your personal data will also have the following purposes:

elaboration, settlement and payment of the remuneration, emoluments, fees due and related accounting;

fulfilment of obligations deriving from laws, contracts, regulations regarding social security and assistance, including supplementary and complementary assistance, occupational health and safety, tax matters, insurance matters;

protection of rights in court.

Following the stipulation of employment contracts and collaborations, employees and collaborators will have the opportunity to use online services reserved for employees, such as the e-mail address provided by the company for the performance of their functions, or "possible authentication to be able to use restricted areas on the company's official website. Access to the e-mail address and browsing within these restricted areas will be allowed only after registration. The registration process consists in the attribution of authentication credentials by the company with which employees and collaborators will be able to access the reserved areas and the e-mail addresses assigned to them.

Therefore, further reasons for the processing are represented by the need to allow the completion of the requests for procedures after online registration.

C) OPTIONAL or COMPULSORY CONSENT

The communication of personal data for the aforementioned purposes is a legal obligation and a necessary requirement for the STIPULATION AND MANAGEMENT of the employment contract and the collaboration contract and the interested party has the obligation to provide personal data under penalty of failure to establish the employment relationship and collaboration.

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

The data will be communicated to public entities such as competent health services, bodies responsible for the recognition of the cause of service and fair compensation, bodies responsible for the supervision of hygiene and safety in the workplace, social security and insurance bodies, public safety authorities, for welfare and social security purposes as well as for reporting occupational diseases or accidents at work, Municipality, Province, Regional School Office and Territorial Areas, judicial police bodies, tax police bodies, financial police, judiciary, and accounting consultancy firms and legal and labour consulting firm. The data will be communicated to the system administrator, the credentials keeper or in any case to the companies that will take care of the maintenance of the computer system; the data you provide may be disclosed to third parties who provide services to this company such as travel agencies and accommodation facilities (exclusively in relation to school trips,

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educational trips and school camps), any companies providing other services (such as canteen services). Some data will also be communicated to museums on the occasion of exhibitions and open monuments event, to schools of English, French and Chinese or other languages, where relevant to the institutional activity in which the exams required by the training offer will take place.

In particular, it is specified and informed that the system administrator and the credentials keeper or the company which is the company that from time to time will deal with the assignment and maintenance of the mailboxes and employees' servers will have access for exclusive purposes for maintenance of the mailboxes of employees and collaborators assigned by the company with the limits given by the inviolability and secrecy of correspondence protected both in civil and criminal law.

We inform you that the labour consultancy firm that processes the data for the purpose of stipulating employment and collaboration contracts, drafting pay slips, for the purposes of vacation planning and disease management and that collaborates with the employer to initiate disciplinary proceedings, becomes aware of the sensitive, health and judicial data of employees and collaborators. The Labour Consultancy firm is the following: Raccis Secchi & Tamponi Associated Commercial Tax Office of Cagliari.

E) DATA STORAGE TIMES

The data will be kept for the duration of the employment relationship, and in any case for the additional ten years from the termination of the employment relationship to allow the employee's career reconstruction, for the issue of any certifications and in order to cope with any disputes arising out of the employment relationship. The documents relating to civil, accounting and tax data will in any case be kept for ten years.

F) COMMUNICATION ABROAD

In the context of intercultural exchanges between schools managed by Chatterbox Srl and schools in foreign countries belonging to the European Community, the data of minors may be communicated to the managers and referents of the schools identified for the training and internship sessions of minors and for the " performance of related services.

G) OWNER AND REFERENT OF THE TREATMENT

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

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H) ONLINE COMMUNICATION

Through the website, the blog, the Instagram social network, the FB page and the Chatterbox World group hosted by the Facebook Social Network.

In order to facilitate institutional communication, and school/family communication, the school will use, alongside the traditional communication via e-mail that will continue to operate, a closed group hosted on a page of the Facebook Social Network called: Chatterbox World group. The group, whose profile will be set up with a closed privacy, will allow access only to parents/exercisers of parental responsibility and to school staff (Property, Employees and External Collaborators) who will request it to the group administrator indicated in Mrs. Bronya Sykes. Email: bronya.sykes@chatterboxschools.co.uk Mobile: 3357082421.

The group may publish unencrypted photos of the school staff engaged in institutional and educational activities and in demonstrations or events. To be accessible, the group will require a Facebook account from the group participant and the authorization of the group administrator. In order to be published by group participants, the Posts must have the authorization of the group administrator and may never contain any sensitive or judicial data of anyone. They may contain personal data, (never identifying the persons of minors), only of persons participating in the group in order to promptly allow any opposition to the treatment. The posts may not contain photos / videos that allow the identification of minors, under penalty of non-publication. Any personal data, including photos, which in no case may be of the nature of sensitive and judicial data, published within the group, and collected from interested parties, will be communicated to the Facebook platform with the publication; will be kept through publication within the group for the time necessary for the school for its communications and in any case all personal data published on the group page will be removed by the Institution upon termination of the school performance contract, without prejudice to Facebook's rights on same data. Within the group, photos of the school activity may be published, but children will never be filmed in clear text and in such a way as to be identifiable through the images of photos or videos. The communication of data with the consequent registration to the Facebook group is not mandatory and does not involve any limitation to the stipulation and management of the school performance contract or to the employment and collaboration contract with the company and the school and interested parties will have the right to object at any time to the treatment. The data published on the Facebook group will in any case be subject to the same rules, regulations and methods of treatment indicated in paragraphs A, B, D, E, F, except for the mandatory consent referred to in letter C.

For the school's advertising purposes, the company will use additional channels such as the website, the blog, the Instagram and Facebook social networks where clear photos of employees or collaborators may be published with the consent of the same expressed with this information.

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Employee photos may also be displayed at school locations and featured in any brochures or publications.

Video surveillance system

In the headquarters of the nursery school managed by Chatterbox SRL in Viale La Playa Cagliari there are video surveillance systems installed to protect the company assets. The installation and management of the system, carried out with the authorization issued by the competent authorities, is regulated by the school so that the video surveillance systems inside the buildings come into operation only when the offices are closed and in order to avoid any external control of employee activity. External video surveillance systems are also envisaged in the two aforementioned offices which will remain in operation 24 hours a day, which can film employees only occasionally, duly authorized by the competent authority for the protection of company assets and employee safety and whose information is duly communicated to employees together with the regulation of the video surveillance system.

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. (and of the data controller) as required by 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, if necessary, their communication in 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 processing 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 correction or cancellation of the same or the limitation of the processing that concerns him;

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 obviously cannot concern cases in which the processing, for example, is necessary to fulfil a legal obligation to which the data controller is subject or for the execution of a task in the public interest or connected to the exercise of public authority of which the data controller is invested;

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to lodge a complaint with the supervisory authority (Privacy Guarantor).

SENSITIVE DATA

The personal data defined as "sensitive data" or as "judicial data" by the Code will be processed exclusively by the school staff, specifically appointed, in accordance with the provisions of the law and regulations and in compliance with the principle of strictly indispensable processing. We remind you that sensitive data are 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 nature, philosophical, political or trade union, as well as personal data suitable for revealing the state of health and sexual life ". Judicial data are personal data suitable for disclosing provisions referred to in Article 3, paragraph 1, letters from a) to o) and from r) to u), of the Presidential Decree November 14, 2002, n. 313, in the matter of criminal records, the register of administrative sanctions depending on the crime and the related pending charges, or the capacity of accused or suspected person pursuant to articles 60 and 61 of the criminal procedure code.

Article 9 of the European Regulation

Processing of special categories of personal data

1. It is forbidden to process personal data that reveal 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 health or the person's sexual life or sexual orientation.
2. Paragraph 1 does not apply if one of the following occurs:

..OMISSIS...

- the processing is necessary for reasons of significant 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 rights fundamental 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, paragraph 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.

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CONSENT TO THE PROCESSING OF PERSONAL DATA PROVIDED TO CHATTERBOX SRL

Mr./Mrs. _____ born in _____ residing in _____, in his capacity as employee/collaborator of Chatterbox Srl. of the nursery school, primary school and supplier of parental education service and the services related and instrumental to the instruction provided by the same, acknowledging that they have carefully read the above information and have fully understood its content, give their consent to the processing of personal data including sensitive and judicial data as indicated by the Privacy Code and the European Regulation, by Chatterbox Srl for the precise purposes indicated in the same information, aware that the expression of consent is a necessary prerequisite for the stipulation and management of the employment contract.

Date

Employee's signature

CONSENT TO THE PROCESSING OF PERSONAL DATA PROVIDED TO CHATTERBOX SRL ONLINE COMMUNICATION - through the website, the blog, the Instagram social network, the FB page and the Chatterbox World group hosted by the Facebook Social Network.

Mr./Mrs _____ born in _____ residing in _____, in his capacity as employee / collaborator of Chatterbox Srl. of the playschool, primary school and supplier of parental education service and related and instrumental services to education provided by the same, given that you have carefully read the above information relating to ONLINE COMMUNICATION - through the site, blog, social network Instagram, the FB page and the Chatterbox group World hosted by the Facebook Social Network

gives consent to the processing of personal data by Chatterbox Srl for the precise purposes indicated in the same information.

Date

Employee's signature