

**Subject: Privacy information document pursuant to Article 13 of EU Regulation GDPR 2016/679 - "Undertaking Business in Culture" programme candidates and participants**

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This information is provided pursuant to Art. 13 of the European General Data Protection Regulation (EU Regulation 2016/679, hereinafter, the "Regulation") jointly by the Fondazione Scuola dei beni e delle attività culturali and the International Centre for the Study of the Preservation and Restoration of Cultural Property, in their capacity as Joint Controllers of the processing of personal data (hereinafter, the "Joint Controllers") pursuant to Articles 4, 24 and 26 of the Regulation, with reference to the data collected from the subject in the application for the programme "Undertaking Business in Culture", as well as in the execution of the training activities related to the initiative.

## **1. Data controller**

The Joint Controllers are:

- International Centre for the Study of the Preservation and Restoration of Cultural Property (hereinafter ICCROM), based in Rome, Via di San Michele, 13;
- la Fondazione Scuola dei beni e delle attività culturali (hereinafter Fondazione) based in Rome, Via del Collegio Romano, 27.

Pursuant to art. 37 of the Regulation, the Data Protection Officer (RPD or DPO - Data Protection Officer) is Systema Consulting Srl, which can be contacted at the following addresses: email: [rpd@fondazione scuolapatrimonio.it](mailto:rpd@fondazione scuolapatrimonio.it), pec: [rpd.scuolapatrimonio@pec.it](mailto:rpd.scuolapatrimonio@pec.it); via del Collegio Romano, 27 - 00186 Rome.

## **2. Purposes of data processing**

Your personal data will be processed by the Joint Controllers for the sole purposes related to the performance of its institutional tasks and the execution of the training activities requested by filling in the form, and in particular:

### *3.1 Scope of selection for participation in training activities*

- a. Selection of participants for admittance to the course;
- b. Obligations resulting from the enrolment of candidates selected to attend the training course, including obligations related to the organisation, conduct, conclusion and feedback of training courses, data collection and processing of data;
- c. Communications on service updates, dispatch of notices, satisfaction questionnaires, information notes or training course enrolment papers.

### *3.2 Scope of newsletter dispatch:*

- a. *Your data may be processed, with your explicit consent, to dispatch newsletters concerning the institutional activities of the Fondazione.*

### *3.3 Scope of fulfilling obligations under the law, EU regulations or standards*

- a. Personal data will be processed in order to fulfil the obligations under the law, a EU regulation or standard as well as rules, codes or procedures approved by Authorities and other competent Institutions and for civil, accounting and fiscal, labour, social security and welfare purposes.

The data that will be processed for the purposes set out above may be: name, date and place of birth, personal contact details such as residential address and telephone or email / certified email addresses, qualifications, documents proving identity. We also collect and process data relating to attendance at courses, assessments and any other useful or indispensable data for carrying out the didactic-training activity.

## **3. Scope of communication and circulation**

The collected data will not be distributed, but we may communicate some personal data externally to third parties to whom the communication is strictly necessary for the fulfilment of the obligations deriving from the application you signed, and from the legal requirements. With reference to art. 13, paragraph 1, letter (e) of the EU Regulation, the categories of subjects who may become aware of the personal data of the student and his / her family members as data processors or persons authorized to process are indicated here below, listed by categories:

- Personnel of the Joint Controllers, appointed and authorized to process;
- Third parties involved by the Joint Controllers for the organization, execution and administrative management of the services (service providers, technical consultants, IT consultants, lawyers, tax consultants, evaluation committee members, lecturers, collaborators, etc.).
- Public bodies and administrative bodies to fulfil the obligations established by law.

The full list of recipients of personal data may be requested by the subject by sending an email to [privacy@fondazione scuolapatrimonio.it](mailto:privacy@fondazione scuolapatrimonio.it), jointly identified by the Joint Controllers.

#### **4. Legal basis for the mandatory consent for the pursuit of the purposes of the processing of personal data**

The processing operations referred to in point 3.1(a) and (b) are necessary for the performance of services requested directly by the subject; therefore, the legal basis for the processing is that provided for by Article 6(b) of the Regulation. The processing operations referred to in point 3.2 are carried out on the basis of your free and express consent; therefore, the legal basis of the processing is that provided for by Article 6(a) of the Regulation. The granting of consent is neither binding nor compulsory for the purposes of registration and may be revoked at any time, in the manner set out in point 6 below.

The processing operations referred to in point 3.3 are necessary for the fulfilment of legal obligations to which the Joint Controllers are subject; therefore, the legal basis for the processing is that provided for in Article 6(c) of the Regulation. Should the personal data requested and necessary on the basis of the above not be provided, the person concerned would be excluded from the selection procedures and consequently from the training activities proposed by the Joint Controllers.

The personal data of aspiring participants and participants selected for the training activities will not be used for further purposes.

#### **5. Data storage time**

Your personal data will be kept in full compliance with the security measures provided for by the legislation on the protection of personal data and will be kept for the time connected to the performance of operational, administrative and institutional activities related to the purposes described above. Therefore, the data will be processed for the entire duration of the relationships established and also subsequently for the fulfilment of all legal obligations.

Pursuant to art. 13, paragraph 1, letter (f) of the EU Regulation, we inform you that all data collected will not be transferred to a third country or to an international organization, neither within nor outside the European Union.

We also inform you that automated decision-making processes will not be used in the processing of your personal data.

#### **6. Exercise of the rights of the interested party**

Pursuant to Articles 13, paragraph 2, letters (b) and (d), 15, 18, 19 and 21 of the EU Regulation, the interested party is informed that:

- a) he/she has the right to ask the Data Controller to access personal data, to correct them or, if they are no longer necessary for the purposes for which they were collected, to cancel them or to oppose their processing, in addition to right to data portability. Please note that opposition to the data processing or deletion of the data will make it impossible to provide the requested services.

To exercise the aforementioned rights, it will be sufficient to send an email to [privacy@fondazione scuolapatrimonio.it](mailto:privacy@fondazione scuolapatrimonio.it), jointly identified by the Joint Controllers.

In any case, the subject has the right to contact, by any means, both Joint Controllers, in accordance with Article 26 of EU Regulation 2016/679.

To revoke the consent to the processing of data for the purpose of newsletter dispatch, you can use the link in the footer of communications received from the Fondazione.

Any corrections or cancellations or limitations of processing carried out at the request of the interested party - unless this proves impossible or involves a disproportionate effort – will be shared between the Joint Controllers in the manner defined in the specific Co-ownership Agreement and communicated to each of the subjects to whom the personal data may be transmitted, as described in point 3.

The exercise of rights is not subject to any formal constraints and is free of charge.

In addition, the subject has the right to lodge a complaint with the Garante per la protezione dei dati personali, following the procedures and instructions published on the Authority's official website at [www.garanteprivacy.it](http://www.garanteprivacy.it).

#### **7. Update of this information**

This disclosure statement is subject to updating due to legislative changes and internal organisational changes within the Fondazione. As provided for in the Co-ownership agreement, this information notice will be published, in its most up-to-date version, on the Fondazione's institutional website. Interested parties are therefore invited to periodically check its content.

#### **8. Processing consents**

Having read and understood the purposes set out in point 3 and the way in which the personal data are processed as set out in this information notice, the subscriber hereby consents to the processing of personal data.