

Privacy is important to us.

Information pursuant to Art. 13 Regulation (EU) 2016/679 - Subscribers

Who is the Data Controller (hereinafter also referred to as "Controller"):

Cooperativa Gestione Trasporti Alunni Scuola Europea Varese

Via Montello, 118 - 21100 Varese

VAT No. 0232070125

E-mail info@trasportisev.eu

Tel. No. 0332 242092

Data Protection Officer (DPO)

The Data Protection Officer appointed by the Data Controller can be contacted at the following e-mail address: dpo@trasportisev.eu

Purpose and legal basis of data processing

The personal data you provide will be processed solely for the following purposes:

a) Provision of Requested Services:

- Legal Basis: Article 6(1)(b) of the GDPR, pertaining to processing necessary for the performance of a contract to which the data subject is a party.

b) Administrative and accounting management;

- Legal Basis: Articles 6(1)(b) and 6(1)(c) of the GDPR. Processing under Article 6(1)(b) supports the correct and complete performance of contractual obligations. Article 6(1)(c) applies as processing is also necessary to comply with a legal obligation (e.g., financial reporting, tax obligations) to which the data controller is subject.

c) To provide dedicated assistance;

- Legal basis: Art.9(2)(a) Explicit consent. The provision of consent is not mandatory but will result in the impossibility of providing the assistance service.

What personal data we use

We only process personal data strictly necessary to achieve the above-mentioned purposes.

Membership category	Type of processed data	Purpose
personal data belonging to the pupil's legal representatives and exercising parental authority	Personal data and contact details.	Administrative and accounting management. Dispatch of communications relating to the transport service.
personal data belonging to pupils	Personal data.	To carry out the activities resulting from the application.
special categories of personal data belonging to pupils (if necessary)	Health-related data: medical certificates or declarations concerning the state of health.	To provide specific assistance.

Recipients or categories of recipients of personal data

In an appropriate manner, relevant and limited to what is necessary for the purposes pursued as indicated above, your data may be communicated to third parties, for technical and operational requirements strictly related to the purposes set out above and in particular to the following categories of subjects:

- a) competent authorities, for the performance of their institutional functions within the limits established by law or regulations;
- b) suppliers of IT services such as: cloud services, electronic mail, electronic invoicing and storage, hardware and software technical assistance and maintenance services;
- c) suppliers providing consultancy services in organisational, management, administrative, environmental, occupational health and safety, security and data protection fields;
- d) subjects that manage debt collection or provide professional consulting services and fiscal, legal and judicial assistance;
- e) Providers of transport and monitor services.

The Data Controller, where applicable, has bound the processing of data by the above-mentioned recipients through a contract or other legal act governing the processing of data in accordance with Article 28 of EU Regulation 679/2016.

In view of the fundamental principles enshrined in the applicable legislation, the Data Controller has defined the persons authorised to process personal data under its direct authority. These persons act on the basis of specific given instructions regarding the purposes and methods of such processing.

Only for JRC Ispra staff to proceed with direct invoicing to the European Commission

If you opt for direct PMO billing, we will share with the European Commission's PMO Office, as an independent data controller (Reg. (EU) 2018/1725), only the data necessary for payment and verification of the maximum limits: name of the minor, zone, type of subscription, period of use, name of the parent/guardian and price per zone. The legal basis is Article 6(1)(b) of the GDPR (performance of a contract). The data is transmitted via secure channels and stored for the time strictly necessary for reconciliation and verification purposes.

Where we transfer your personal data

As a rule, personal data are not transferred to countries outside the European Economic Area.

Period of data retention

The personal data provided will only be processed for the time necessary to pursue the stated purposes. The Data Controller adopts specific information management and storage policies and procedures so that personal data are deleted after a reasonable time according to the following retention criteria:

- Data will be retained for the duration of our contractual relationship.
- Data will be retained for the period required to fulfil legal and contractual obligations. In any case, data will not be retained for more than 10 years after the conclusion of the relationship.

Fundamental rights of the data subject and how to exercise them

Article 15-22 Reg (EU) 2016/679

Under the circumstances and conditions, and subject to the exceptions, set out in the applicable law, you, as a data subject, have the following rights:

- **Right of Access:** you have the right to obtain confirmation regarding whether personal data concerning you is being processed. You also have the right to access your personal data and to receive a copy of it.
- **Right to Rectification:** you have the right to correct any inaccurate personal data concerning you. Additionally, you can supplement any incomplete personal data
- **Right to Object:** oppose data processing for legitimate reasons.
- **Right to Erasure:** you have the right to request the deletion of your personal data when it is no longer necessary for the purposes for which it was collected.

- **Right to Restriction of Processing:** you have the right to restrict the processing of your personal data under specific circumstances.
- **Right to Data Portability:** you have the right to receive the personal data that you have provided, in a structured, commonly used, and machine-readable format

To exercise these rights, you may send a request to info@trasportisev.eu. The Data Controller will comply with your request without undue delay and, in any case, within one month of receipt of the request. Pursuant to Article 19, any requests for rectification or deletion or restriction of processing shall be transmitted by the Data Controller to each of the recipients to whom the personal data have been transmitted, unless this proves impossible or involves a disproportionate effort.

Right to lodge a complaint with a supervisory authority

It is your right to lodge a complaint with the competent supervisory authority (Data Protection Authority <http://www.garanteprivacy.it>).