

## PRIVACY NOTICE

PRIVACY / Information pursuant to Art. 13 of EU Regulation 679/16 (GDPR)

### 1. WHY YOU ARE RECEIVING THIS COMMUNICATION

Istituto Marangoni Limited, as Data Controller, wishes to inform you about the type of data we collect and the methods we use to do this, in order to guarantee respect for your fundamental rights and freedoms, with particular reference to the confidentiality and security with which the data are processed.

### 2. WHICH PERSONAL DATA WE COLLECT

Istituto Marangoni Limited collects and stores your personal data at the time of enrollment/registration:

- Identifying data such as given name, surname, residential address, email address, studies completed, citizenship, gender, place and date of birth, telephone number, copy of identity card/passport, Visa, Non-EU residence permit, tax identification number.
- Emergency contact.
- Identifying data of underage students and their parents.
- Special categories of personal data such as ethnicity, religious belief, sexual orientation.
- Your banking data and/or those belonging to the person making the payment.
- Possible person to be contacted for administrative aspects, including payments.
- Information about your/your family income, assets (in the prescribed cases)
- Any medical certifications proving disability.
- Academic career / curriculum vitae (previous studies and work experience, if any).
- Student's images.

### 3. FOR WHAT PURPOSES WE USE YOUR PERSONAL DATA

Istituto Marangoni Limited uses your data for the following purposes:

- a) To fulfil pre-contractual and contractual obligations, to allow your enrollment in the course of your choice, as well as the provision of services connected to it.
- b) To handle money collections and payments, deriving from contractual obligations, including credit recovery.
- c) To create your user account and your relative email account.
- d) To create your student ID card.
- e) To handle academic activities.
- f) To share your data with Regent's University London at its request to ensure validation of the academic course.
- g) To enable access to web-based platforms and to apps connected to Istituto Marangoni Limited, to allow access to/modification of the study plan, exams enrolments, refusal of grades, in accordance with the student regulations, presentation of final diploma examination admission application, and displaying of presences and absences.

Within the scope of the purposes above under the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. (Art. 6(1)(b) of GDPR).

- h) To provide support services to certified disabled students or with or with specific learning disabilities.
  - i) To readmit a student to classes in the event of absence.
  - j) To respond to requests received from HESA (Higher Education Statistics Agency) in order to enable it to conduct an analysis of data on higher education (HE) in the U.K.
  - k) To fulfil the obligations arising from the Law, Regulations, EU legislation or any order of the Authorities (including checks relating to the provision of cash contributions and/or scholarships and/or benefits in general, if entitlement to receive these is ascertained).
- Within the scope of the purposes h), i) and j) the data will be used to

fulfill a legal obligation pursuant to Art. 9(2) (b) of GDPR. Within the scope of the purpose k) the data will be used to fulfill a legal obligation pursuant to Art. 6(1) (c) of GDPR.

- l) Data may also be collected by the Galileo Global Education Italia Group in aggregate form to perform statistical analyses.
- m) To contact you only in case of emergency using the "emergency contact".
- n) Use of photographic and/or video material of you for internal use (e.g. badge, user account)
- o) Sharing the photographic and/or audiovisual material, relating your graduation session, by any means in order to allow you to view it (e.g. drive shared with you and other graduating students)

Within the scope of the purposes above, the data will be used to fulfill the legitimate interests pursued by the controller (Art. 6(1) (f) of GDPR).

- p) To share your special categories of personal data (disability and ethnicity) with UCAS ("Universities and Colleges Admissions Service") in order to enable the latter to monitor the existence or absence of equality of opportunity or treatment among different groups of people, including differences based on ethnicity.

Within the scope of the purpose above, data will be processed on the legal basis of public interest (Art. 9(2) (g) of GDPR).

- q) To inform parents or legal guardians about general and/or specific news relating to your course of studies and/or academic performance.
- r) Istituto Marangoni Limited is part of the Galileo Global Education Group. Your data may be transferred to other Institutes of the Galileo Global Education Group to promote courses based on the aptitudes and interests of each student or to enrich their studies.
- s) To use and publishate your photographs and/or films for educational, institutional or promotional purposes, on Istituto Marangoni Limited websites and social networks (e.g., Facebook, YouTube, etc.).
- t) To insert your name in the career service online platform designed to promote intermediation between job supply and demand (except for short courses).
- u) To share your special category data (disability) with Regent's University London at its request.

Within the scope of the purposes above, the data processing has its legal basis in the acquisition of appropriate consent from the data subject (Art. 6, par. 1 Lett. a), of GDPR).

**Please Note:** Your consent for the purpose set out in point (r) of this privacy policy must be given by signing the relevant "Release for the production and publication of audiovisual and photographic material" below.

### 3.1 Data retention

For purposes 3, lett. a), b), c), d), e), f), g), j), k), l) and p) we retain your personal data for the whole duration of the time you spend on Campus and even beyond the 10-year period of limitation from the termination of the relationship to comply with legal obligations and for purposes of judicial protection. For the purposes set out under 3, lett. h) and i) we keep your personal data for a period not exceeding 12 months after collection. Students' files (e.g. degrees) are kept on paper or IT support unlimitedly, in order to respond to any requests from former students in relation to academic career, course credits or diplomas. Where a deadline is set, the data will be destroyed or made anonymous after the deadline has expired.

For the purpose set out in point 3 lett. m) and n) of this privacy policy, we retain your data until the end of your academic career.

For the purpose set out in point 3 lett. o) of this privacy policy, we retain your data for a period of time not exceeding 12 months after sharing.

For the purpose of point 3, lett. q), we keep your data for the duration of the academic course attended.

For the purpose of point 3, lett. r), we keep your data for the duration of the academic course attended.

For the purpose of point 3, lett. s), we keep your data until consent is revoked.

For the purpose of point 3, lett. t), we keep your data for 3 years after collection within the Career Service system.

For the purpose of point 3), lett. u), we keep your data for the duration of the academic course attended.

This is without prejudice to your right to revoke your consent at any time in the manner described in section 8 of this policy.

**Please note:** If, in the event of litigation, it is necessary to ascertain, exercise or defend the rights of the Data Controller, the period of data collected retention, for the above purposes, may be extended due to the possibility that it may be necessary to prepare defensive elements in that time frame.

In that case, the data retention will take place exclusively until the conclusion of the litigation.

#### 4. THE SECURITY OF YOUR PERSONAL DATA

Your data will be processed using equipment that guarantees their confidentiality, integrity and availability. The processing is carried out on paper and through computerised and/or automated systems and will include all of the operations or sets of operations envisaged in Art. 4 of the GDPR which are necessary for the data processing, including communication with the subjects assigned to the processing itself. The data will not be disseminated; however, they will or may be communicated to public or private entities or individuals who operate within the context of the purposes described above.

#### 5. WHO CAN ACCESS YOUR PERSONAL DATA

Only authorised persons can access your data in the context of the tasks assigned by Istituto Marangoni Limited. Personal data will not be disseminated in any way; in addition, they may be communicated and processed by third parties duly appointed as Data Processors, such as external collaborators and companies that provide specific technical services. Your data may also be accessed by authorised persons employed by Galileo Global Education Italia, as well as employees of Istituto Marangoni Limited and NABA, belonging to the same Group. Personal data may also be accessible or may be disclosed to those whose right to access your personal data is recognised by the provisions of law or secondary or European Union regulatory provisions.

Your data will also be passed to UK government bodies such as Visa & Immigration and also to non-government bodies such as UCAS ("*Universities and College Admissions Service*").

Your personal data will be accessible to Regent's University London with which Istituto Marangoni has a partnership agreement in order to validate academic courses.

Your data for the purposes set out in point 3.2, may be processed by third party research companies such as for example NielsenIQ, IPSOS (limited to your telephone number and e-mail address), HESA (Higher Education Statistics Agency) or other companies such as Office for Students. Your personal data may also be processed for eventual programmes organised by the Group's partner Universities: the list will be made available upon request by the Controller.

Finally, your data will also be accessible by the network of agents working for Istituto Marangoni Limited and by the Consulate.

#### 6. TRANSFER OF PERSONAL DATA

Your personal data will be managed and stored on servers located within the European Union and belonging to the Data Controller

and/or third-party companies appointed and duly identified as Data Processors. Your data will not be transferred outside the European Union.

**Please note:** In the event of any transfer of personal data to third countries, these will be transferred by the Controller, in compliance with Articles 44 et seq. of the GDPR, using appropriate safeguards to ensure their protection. Further information regarding these appropriate safeguards may be obtained upon request to the Controller.

#### 7. IS IT MANDATORY TO CONSENT TO THE PROVISION OF YOUR DATA?

The disclosure of your data referred to in point 3, lett. a), b), c), d), e), f) and g) is necessary to conclude and execute the contract. Processing of your data referred to in point 3, lett. h), i), j), k) is necessary to fulfill legal obligations. For the purpose referred to in point 3, lett. p) is necessary to fulfill a public interest. For the purposes referred to in point 3, lett. q), r), s), t), u) the disclosure of your data it is optional. If you do not consent, you can still proceed with your enrolment.

#### 8. WHAT ARE YOUR RIGHTS IN RELATION TO THE GDPR?

In accordance with the provisions of the GDPR, Istituto Marangoni Limited guarantees the following rights:

- Right to withdraw consent [Art. 7(3) of the EU Regulation] (right to withdraw the consent given. Note: withdrawal of consent does not affect the lawfulness of the processing based on the consent before withdrawal).
- Right of access [Art. 15 of the EU Regulation] (right to obtain confirmation of the existence or otherwise of personal data relating to you and a copy of such data in intelligible form).
- Right to erasure ("right to be forgotten") [Art. 17 of the EU Regulation] (right to have your data erased).
- Right to restriction of processing [Art. 18 of the EU Regulation] (right to obtain restriction of processing, e.g., in case the accuracy of the data is contested or in case of unlawful processing).
- Right to data portability [Art. 20 of the EU Regulation] (right to receive in a structured, commonly used and machine-readable format the personal data concerning you that have been provided to the Controller and the right to transmit such data to another Data Controller without undue delay).
- Right to object [Article 21 of the EU Regulation] (right to object to the processing of your personal data).
- Right not to be subject to automated decision-making [Art. 22 of the EU Regulation] (right not to be subject to a decision based solely on automated processing).

The above rights may be exercised in writing by sending an e-mail to [dpo@naba-da.com](mailto:dpo@naba-da.com). Further information on the processing of personal data may be requested at any time from the same contact. It is also specified that the exercise of your rights shall not prejudice and/ or harm the rights and freedoms of others. The Controller undertakes to respond to requests within one month, except in the case of particularly complex requests, for which a maximum of three months may be required. In any case, the Controller will explain the reason for the delay within one month of the request.

The outcome of the request will be provided in writing (at your request) or electronically (and in this case, free of charge). The Controller specifies that you may be required to pay a fee if your requests are manifestly unfounded, excessive, or repetitive: in this regard the Controller will keep track of the requests. The Controller, in compliance with Article 19 of the GDPR, undertakes to inform the recipients to whom your personal data have been communicated of any rectification, erasure or restriction of processing requested by you, where possible.

#### 9. IF YOU HAVE ANY QUESTIONS PLEASE REFER TO THE CONTACT DETAILS PROVIDED BY THE DATA CONTROLLER

If you believe that we have not complied with your rights regarding the protection of personal data you can contact your local Data Protection Authority as indicated at the following address: <https://ico.org.uk/make-a-complaint/data-protection-complaints/data-protection-complaints/>.

#### 10. DATA CONTROLLER

The Data Controller is Istituto Marangoni Limited, 30 Fashion Street,

London, United Kingdom, E1 6PX. Email:  
**privacy@istitutomarangoni.com** The Data Protection Officer is:  
**dpo@istitutomarangoni.com**

**11.UPDATE TO THIS INFORMATION NOTICE**

This Information Notice may be subject to change. Any substantial changes will be communicated to you via email or through our student platform.

---

**ACKNOWLEDGEMENT OF THE PRIVACY NOTICE AND GIVING OF CONSENT:**

I declare that I have carefully read and understood every part of the above-mentioned Privacy Notice, and I declare that I am aware of the possibility of data transfer to eventual Group's partner Universities. In the latter case, I understand that the data will be processed in accordance with the provisions of the partner University and the agreements in place between the partner University and the Controller. In addition,

- I give my consent to inform parents or legal guardians about general and/or specific news relating to my course of studies.
- I give my consent to insert my name in the career service online platform designed to promote intermediation between job supply and demand.
- I give my consent for transfer my personal data to other Institutes of the Galileo Global Education Italia Group to promote courses based on the aptitudes and interests of each student or to enrich their studies.
- I give my consent to share my special category data (disability) with Regent's University London at its request.

*Signature (legible) of Data Subject*

*Place and date*

---

---

**RELEASE FOR THE PRODUCTION AND PUBLICATION OF AUDIOVISUAL AND PHOTOGRAPHIC MATERIAL**

I, the undersigned, Name \_\_\_\_\_ Surname \_\_\_\_\_, born on \_\_/\_\_/\_\_ in \_\_\_\_\_ ( ) e resident in \_\_\_\_\_ ( ) at \_\_\_\_\_,

**AUTHORIZES**

Istituto Marangoni Limited pursuant to Data Protection Act and pursuant to Art. 6 of Reg.UE 679/2016 (GDPR) to use the audiovisual and/or photographic material (images, electronic recordings, films, videos and audio recordings of the person and face - in some cases, even name and surname) provided for:

1. Use of photographic and/or video material of me for internal use (e.g. badge, user account) referred to in Article 3, letter m) of the privacy policy.
2. Promotional and communication activities through publication on the Websites owned by Istituto Marangoni Limited and social channels used by the same (such as Facebook, Twitter, Instagram, YouTube, LinkedIn, etc.) referred to in Article 3, letter q) of the privacy policy.

Images will not be used in contexts that undermine personal dignity and decorum.

Finally, it should be noted that Istituto Marangoni is not obliged to use the audiovisual and/or photographic material.

The undersigned declares:

- That I have read and accepted the methods and purposes of processing of personal data detailed in the above-mentioned privacy policy;
- To waive any remuneration for the acquisition and use of the audiovisual and/or photographic material;
- To accept that Istituto Marangoni Limited is the owner of the copyright of the audiovisual and/or photographic material and that it may be published on the aforementioned channels;
- That I am aware that the audiovisual and/or photographic material may be modified, copied, displayed, published or distributed and I waive my right to inspect or approve the finished product in which my image appears;
- To be informed and aware of the fact that, in the event of publication on websites or social networks, the audiovisual and/or photographic material may be subject to downloading and, in any case, to activities beyond the control of Istituto Marangoni Limited.

\*\*\*

In accordance with the provisions of the art. 7 of the EU Regulation (GDPR), the undersigned \_\_\_\_\_ declares that he/she has read and fully understood the information provided by Istituto Marangoni Limited as Data Controller.

\_\_\_\_\_

(Place and date)

\_\_\_\_\_

(Signature)

