



FONDAZIONE OPERA
SANT'ALESSANDRO

Qui si diventa grandi.

Sede legale
Piazza Duomo, 5
24129 Bergamo
C.F. 95059800169
P.I. 00634550164

Domicilio fiscale
Via S. Alessandro, 49/A 24122
Bergamo
Tel: 035 – 218 500

Contatti
amministrazione@operasantalessandro.it
amministrazione@pec.operasantalessandro.it www.osabg.it

PRIVACY POLICY FOR FAMILIES

Dear Family,

The Fondazione Opera Sant'Alessandro is the managing body of the institution attended by your child and wishes to inform you that, in accordance with the CEI General Decree "Provisions for the protection of the right to a good reputation and the confidentiality of data relating to individuals of the faithful, ecclesiastical bodies and lay associations" dated May 24, 2018 (hereinafter: "General Decree") and the EU Regulation 2016/679 (hereinafter: "Regulation"), your Personal Data, collected for the purpose of contract management and compliance with legal obligations, will be processed by the Foundation itself, with registered office at Via S. Alessandro, 49/A, Bergamo, acting as the Data Controller ("Controller").

Types of Data Processed

The Controller will process personal data, and in some cases "special categories" of data as defined by the Regulation, collected during pre-enrollment and enrollment (and during school attendance), including, but not limited to: your name, surname, address, landline and mobile phone numbers, health-related data such as information on allergies or food intolerances, and biometric data, such as images of the data subject captured in photographs and videos. Data will be processed in paper and digital format in compliance with applicable regulations and principles of fairness, lawfulness, transparency, and confidentiality. Data provided will be processed solely for the purposes for which they were collected.



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Purpose, Legal Basis, and Optional Nature of Processing

Your Personal Data will be processed, without the need for your specific consent, to manage obligations related to enrollment and to fulfill legal obligations. Data will be processed for the following purposes:

1. Management of pre-enrollment and enrollment;
2. Administrative-accounting purposes: issuance and registration of contribution receipts, income management, and credit control;
3. Management of institutional communication addressed to families of the Fondazione Opera Sant'Alessandro;
4. Management of images taken during the school year and during school and extracurricular activities organized by the Foundation for the creation of educational and communication material.

The legal bases for processing are the performance of a contract or pre-contractual measures (Art. 6(1)(b) of the Regulation), and the fulfillment of a legal obligation (Art. 4 §1(b) of the General Decree; Art. 6(1)(c) of the Regulation).

Providing your Personal Data for the purposes indicated above is optional, but failure to provide it may prevent the conclusion of the contract. Purpose 4: processing of your special data requires your explicit consent, which is optional but without which you may not be able to fully benefit from the ancillary services provided by the Controller. Purposes 5 and 6 require consent; refusal does not affect regular school attendance.

Recipients of Personal Data

Your Personal Data may be shared with:



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- Individuals authorized by the Controller to process personal data, upon signing a confidentiality agreement (e.g. staff of the Personnel/Administration Department, system administrators);
- Consultants, banks for accounting-administrative purposes, insurance companies, local health authorities; educational trip destinations (acting as independent data controllers);
- Entities, authorities or organizations to whom data disclosure is mandatory by law or by order of the authorities;
- Schools of the same or higher level, even third-party institutions, chosen by the data subject after leaving the Controller's institution, only with explicit consent.

Regarding the potential transfer of Data to non-EU countries, the Controller informs that processing will occur in accordance with legally permitted methods, such as obtaining the data subject's consent, adoption of Standard Contractual Clauses approved by the European Commission, selection of entities participating in international data transfer programs, or operating in countries deemed safe by the European Commission. More information is available upon request from the Controller.

Data Retention

Your Personal Data will be retained for the time necessary to manage school attendance, limited to the purposes for which they were collected. Further retention as required by applicable law is reserved.

Your Rights

You have the right to request from the Controller, at any time, access to your Personal Data, their rectification or erasure, or to object to their processing. You have the right



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to request restriction of processing under the conditions provided for by Art. 7 §§ 2-3 and Art. 8 § 8 of the General Decree and Art. 18 of the Regulation, as well as to receive your data in a structured, commonly used, and machine-readable format as provided by Art. 20 of the Regulation.

Requests must be addressed in writing to the Controller at: Fondazione Opera S. Alessandro - Via S. Alessandro, 49/A - 24122 Bergamo or at: privacy@operasantalessandro.it

In any case, you always have the right to lodge a complaint with the Data Protection Authority, pursuant to Art. 77 of the Regulation, if you believe that the processing of your data violates current regulations.

Consent to Data Processing

I, the undersigned _____ parent or legal guardian of the student _____ attending the institution: **Accademia Musicale Santa Cecilia, Bergamo**

AUTHORIZE the processing of data as described in the provided privacy policy, being aware that I may exercise my rights at any time as outlined therein, and in particular:

1. I consent to the use of our child's images in any school publications (optical, magnetic, or paper formats) distributed solely among school users and their families; refusal of consent does not affect regular school attendance.

☐ YES ☐ NO

2. I authorize, free of charge and without time limits, pursuant to Articles 10 and 320 of the Civil Code and Articles 96 and 97 of Law 633/1941 (Copyright Law),



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the publication and/or distribution of their images on institutional websites, social networks, online media banners, and printed materials, and authorize storage of the photos in the Foundation's digital archives, acknowledging that such publications are intended solely for educational and communication purposes. Refusal of consent does not affect regular school attendance.

☐ YES ☐ NO

Date and Legible Signature of Parent or Legal Guardian:

____/____/____

Parental Responsibility

Legislative Decree No. 154 of December 28, 2013 introduced changes to the Civil Code regarding parenthood. Articles 316(1), 337-ter(3), and 337-quater(3) underline that enrollment requests fall within parental responsibility and must always be jointly agreed upon by both parents.

Therefore, I declare that I have made the choice and granted consent to data processing in compliance with the above-mentioned Civil Code provisions on parental responsibility.

Date and Legible Signature of Parent or Legal Guardian:

____/____/____