



# PRIVACY NOTE





## 1 - WHAT DOES THIS PRIVACY NOTICE MEAN?

This Privacy Notice (“Privacy Notice”) provides information on how the American International School of Vilnius (“AISV”) processes your or your children’s (including foster children) personal data when they apply or are accepted to AISV’s pre-school elementary, secondary and/or IB programs (“Students”) and when such

data is submitted at the time of filing an application for admission to AISV; as well as when AISV is conducting its teaching and learning activities; when visiting the AISV website ([www.aisv.lt](http://www.aisv.lt)), including its social media sites; when recruiting new staff; when carrying out video surveillance by AISV; when managing contracts with suppliers etc.

## 2 - ABOUT THE DATA CONTROLLER

The American International School of Vilnius, corporate ID number 111968960, domiciled at Subačiaus St. 41, LT-11350, Vilnius, is the Data Controller. You may contact our Data Protection Officer at [dpo@aisv.lt](mailto:dpo@aisv.lt).

AISV’s objectives are to meet Students’ needs for cognitive development, learning and self-expression and to help them to

become active members of the society. AISV seeks to foster international cooperation in such areas as education, social life, etc. providing its Students with pre-school, elementary, secondary and additional (if applicable) education and IB program services.

## 3 - WHAT IS PERSONAL DATA?

Personal data is any information collected about a data subject by AISV, which may be used for identifying the data subject and is stored electronically or otherwise.

Personal data includes any information, including the data subject's full name and

address, which is collected by AISV about the data subject for the purposes indicated in this Privacy Notice or in the data subject's separate consent or in his/her agreement with AISV.

## 4 - WHAT PERSONAL DATA DO WE PROCESS AND WHY?

### 4.1. When parents/guardians file applications for enrolment in AISV

In order to consider Students for admission, AISV collects information about the students and their parents/guardians, seeking to select and admit those Students who will be able to study successfully and graduate from AISV.

The following personal data will be collected when an application for enrolment in AISV is completed by the Student's parents/guardians:

- Child's full name, date of birth, Lithuanian personal code, Lithuanian Residence Permit Number (if applicable), mother tongue, other languages spoken, phone number, e-mail address;
- Family details: parents' full names, e-mail addresses, mobile phone numbers
- Academic information: previous school records and transcripts with grades for the past two years, grade level, name and address of the last school attended; information about whether the child previously studied other foreign languages and for how long; the child's choice of another foreign language and whether Lithuanian will be studied as a mother tongue or a foreign language; information about whether the child has been diagnosed

with any physical, learning, behavior, emotional or other disability over the past 5 years and whether he/she has ever been enrolled in any type of special education/advanced learning program or has attended speech therapy; information about whether the child requires any physical or emotional support (e.g. due to mobility issues, allergies, recent family changes or personal difficulties) or has ever skipped/repeated any grade in school; reasons for withdrawing from the present school and whether the child has any special talents or interests in any field; information about extracurricular activities that might be of interest to the child and academic progress reports from the previous school for the past 2 years;

- Student Health Record Form (height, weight, BMI (Body Mass Index), blood pressure, hearing, vision, vision disorders, information about the heart and circulatory system, respiratory system, blood, digestive system, genitourinary system, nervous system, endocrine system, skin rashes, development for age, nutrition status, mental/behavior status, speech, musculoskeletal system; physical education (PE) group; information about whether the child is excused from PE classes; information about the required immunizations, oral cavity and jawbones condition, permission to administer medicine at school, also

whether the child is on some special diet and illnesses that he/she has come through;

- Student Conduct and Abilities Evaluation Form (completed by the homeroom teacher/principal of the previous school): full name and title of the person completing the Form; name, address, phone number and e-mail address of the school the child was previously attending; information about whether the child has ever had any disciplinary, emotional or other concerns or has ever been violent with other children, also whether he/she often gets distracted during class work time and distracts others, and in what way; whether the child may be described as a respectful, positive and contributing member of the school community.

This personal data is collected for the purpose of assessing the student's needs and applicability for AISV programs and signing the Enrolment Agreement. This data will be stored for 5 (five) years after the signing date if the agreement of enrolment in AISV has been signed. In the opposite case, i.e. when no enrolment agreement has been signed, the data will be destroyed in 6 (six) months after the end of the selection process.

#### **4.2. When AISV signs an enrolment agreement**

Having selected the Students to be admitted, AISV and the family signs an enrolment agreement. The following personal data will be collected by AISV in order to sign the enrolment agreement:

- Student's full name, date of birth, full name and signature of one of his/her parents/guardians, Student's passport number, home address in Vilnius, contact person when parents cannot be reached, permanent address abroad, addressee to whom invoices should be sent;
- Family information: parents' citizenships, job places and job positions, e-mail addresses, mobile phone numbers, age of other children in the family;

- Information about whether the parents give their consent for the child to go on field trips organized by AISV, how the child will arrive at school, whether he/she is permitted to leave after school without supervision or to leave campus during the lunch break, whether the parents would be interested in running for the elections to the AISV School Board or in becoming members of the Parent-School Association Board or Room Parents for the child's classroom, also how the family might contribute to the needs and activities of the school community.

This personal data is collected on the grounds of the legitimate interest for the purpose of concluding and carrying out the agreement and will be kept for 5 (five) years after the date of the agreement.

#### **4.3. When AISV conduct teaching and learning process**

The following personal data is processed by AISV during the traditional or distance education process:

- Student's full name, grade, e-mail address, residential address, phone number, personal, gender, date of birth, languages, nationality, IBIS personal code, timetable, attendance, sick leaves, studying results (marks), tests/exams selected and held, a list of universities;
- Parents' full names, e-mail addresses, phone numbers;
- User IP address, device ID, type and OS, browser, log data, geolocation, school name and address, user image, voice data, contents of messages sent and received, other information related to the teaching process (e.g. homework assignments).

This personal data is processed on the grounds of the legitimate interest and will be kept for 5 (five) years after the conclusion of the agreement with AISV. AISV may transfer part of such personal data to Students' parents, to the Lithuanian Ministry of Education and Sports, to the Vilnius city Municipality, or to IT service providers.

#### **4.4. When Students participate in extracurricular activities and AISV Summer Camps**

In order to organize and provide different after-school activities for its Students or Students who participate in AISV Summer Camp, AISV collects the following data: Student's full name, title and place of the extracurricular activities the Student is attending, contact information, attendance. This data is processed on the basis of parents' consent and will be kept until the next school year. AISV may transfer this data to teachers who run such activities or to external after-school activity providers.

#### **4.5. When AISV organizes field trips for its Students within or outside Lithuania**

AISV regularly organizes field trips for its Students within or outside Lithuania.

- To organize overnight field trips within Lithuania, AISV collects the following personal data: Student's full name, full name and signature of one of his/her parents. This data is processed on the basis of parents' consent and will be kept for 6 (six) months after the end of the trip;
- To organize field trips outside Lithuania, AISV collects the following personal data: Student's full name, date of birth, passport details, parents' consent to leave the country with AISV, dietary restrictions, allergies, other information needed for the specific trip, parents' full names and signatures, other information; accompanying person's (AISV teacher's) personal data: full name, date of birth and other information. This personal data is processed on the basis of parents' consent and will be kept for 6 (six) months after the trip. The data may be transferred to travel agencies or embassies for the issuance of visas; it may also be transferred to an insurance agency or to a host family.

Parents' consent will be collected each time an overnight field trip is organized. Prior to any trip (day or overnight trip), parents

will be informed in a written form in school newsletter or an e-mail about the place, time, means of transport, intended activities and the price of such trip. Students will not be allowed to go on the field trip if the parents' consent has not been received.

#### **4.6. When AISV collects annual health forms**

AISV has a school nurse who provides first aid at school. Based on the requirements of the Lithuanian Health Regulations, AISV annually collects the following personal data:

- Student's full name, date of birth, health record form (height, weight, BMI (Body Mass Index), blood pressure, hearing, vision, vision disorders, information about the heart and circulatory system, respiratory system, blood, digestive system, genitourinary system, nervous system, endocrine system, skin rashes, development for age, nutrition status, mental/behavior status, speech, musculoskeletal system; physical education (PE) group; information about whether the child is excused from PE classes; information about the required immunizations, oral cavity and jawbones condition, permission to administer medicine at school, also about whether the child is on some special diet and illnesses that he/she has come through;
- Student Health Record: Student's full name, date of birth, parents'/guardians' phone numbers, address in Vilnius, languages spoken at home, grade, blood type, allergies, information whether parents give permission to give medicine to the Student at school, whether he/she is on a special diet, authorization for routine health screening, information about diseases like hepatitis, mumps, scarlet fever, measles, German measles, chicken pox, tuberculosis, etc. that the Student has come through, parents' signatures, health screening results, visits, complaints.
- Sick leave records: Students who have been absent from school for more than 3 days due to health issues, need to provide doctor's note upon returning to school.

This personal data is collected on the grounds of the legitimate interest to discharge AISV's statutory responsibilities to determine the ability of student to participate in PE and other school activities, provide first aid and healthcare at school. The data will be kept for 3 (three) months after the expiration of the agreement with AISV.

#### **4.7. When AISV provides transportation services to its Students**

AISV provides door-to-door school bus service for its Students who order such service. To provide this service, AISV collects the following personal data: Student's full name, address and contact phone number. This personal data is processed on the basis of the agreement and will be kept for 3 (three) months after the expiration of the agreement with AISV. AISV will transfer this data to the transportation company that is hired by AISV to provide the service.

#### **4.8. When AISV provides library services**

AISV has a library that provides services to its Students. To provide these services, AISV processes the following personal data: Student's full name, grade, e-mail address, books and other materials borrowed. This personal data is processed on the grounds of the legitimate interest to discharge the educational institution's statutory responsibilities and will be kept for 3 (three) months after the expiration of the agreement with AISV.

#### **4.9. When AISV uses Students' personal data for internal and external communication**

Intercommunication among Students, their parents, teachers and other AISV personnel is of paramount importance to the education process. Efficient communication may help to clear up a number of misunderstandings and to contribute positively to AISV community life.

- To ensure internal communication ("Student of the Month" title, birthday greetings, participation at competition/contest certificate, acknowledgment for activities, exhibitions at AISV), AISV processes the following personal data: Student's full name, grade, image, information about participation in academic, athletic or other school-related activities. This information is processed on the grounds of the legitimate interest and will be kept for 3 (three) months after the expiration of the agreement with AISV.

- AISV sends school newsletters to Students, their parents/guardians and staff for internal communication purposes. To that end, the following personal data is processed: Student's full name, grade, image and information about participation in academic, athletic or other school-related activities. This personal data is published on the basis of parents'/guardians' consent and will be kept for 3 (three) months after the expiration of the agreement with AISV. Students' parents/guardians may withdraw their consent to publish their child's personal data in AISV newsletters at any time by sending such withdrawal of consent at [admissions@aisv.lt](mailto:admissions@aisv.lt).

- Students' personal data may also be used for external communication (e.g. Students works exhibitions at galleries). To that end, the following personal data is processed: Student's full name, grade, image and information about participation in academic, athletic or other school-related activities. This data is processed on the grounds of the legitimate interest and will be kept for 3 (three) months after the expiration of the agreement with AISV.

- AISV has a website ([www.aisv.lt](http://www.aisv.lt)) and a social media site (Facebook: [The American International School of Vilnius](#)). For external communication on these media sites, the following personal data may be processed by AISV on the basis of parents'/guardians' consent: Student's full name, grade, image and information about participation in academic, athletic or other school-related

activities. This personal data will be kept for 3 (three) years after the expiration of the agreement with AISV. Students' parents/guardians may withdraw their consent to publish their child's personal data on external media sites at any time.

- Each year, AISV publishes a school yearbook which is printed and circulated among Students and AISV personnel, and one copy is later transferred into the custody of the National Library of Lithuania named after Martynas Mažvydas. To that end, AISV processes the following personal data: Student's full name, image and grade (school year). This personal data is processed on the basis of parents'/guardians' consent which may be withdrawn at any time.

However, such withdrawal of consent will only apply prospectively as AISV will not be objectively able to remove your child's personal information from the school yearbook that has already been printed.

#### **4.10. When AISV conducts communication with Students' parents/guardians**

- AISV personnel may communicate with Students' parents/guardians by sending them school newsletters, e-mails or giving phone calls. The following personal data is processed for such communication purposes: parents'/guardians' full names, e-mail addresses, phone numbers, addresses, work phone numbers. This personal data is processed for the performance of the agreement and will be kept for 3 (three) months after the expiration of the agreement with AISV.

- Parents/guardians may enter the school premises using an individual access card or a guest card. Access cards are issued upon parents'/guardians' request but it is also possible to enter the school premises using a guest card. The following personal data is processed for the individual access card to be issued: full name, photo image and signature. This personal data is processed

on the basis of consent and will be kept for 3 (three) months after the expiration of the agreement with AISV. Parents/guardians may opt to withdraw their consent, in which case they may use the guest card to enter the premises.

#### **4.11. When AISV participates in the Central and Eastern European School Association (CESSA) activities**

AISV is a member of the Central and Eastern European School Association (CESSA) which brings together American and other international schools in that region and encourages cooperation among them through various academic, sports and art events organized for their students on a regular basis.

Students' full names and other personal data will be required for participation in CESSA events, such as MATHCOUNTS, Speech and Debate, Knowledge Bowl, Robotics, HS Girls & Boys Basketball, Volleyball, Middle School Soccer and Cultural Arts Festival. This personal data is processed on the grounds of the legitimate interest to guarantee comprehensive education for students and will be kept for 5 (five) years after the event. This data may be transferred to CESSA (whose server is located in Croatia) or to other CESSA member schools responsible for the organization of the event.

#### **4.12. When AISV gives reports to the U.S. Office of Overseas Schools**

AISV receives grants from the United States Department of State through its Office of Overseas Schools. These grants are given seeking to ensure high quality education in the English language according to the United States accredited programs. To receive this grant, AISV is required to provide the reports on its activities, students' number, nationalities and parent workplaces to the U.S. Office of Overseas Schools on an annual basis.

#### **4.13. When AISV carries out a tripartite agreement with the Vilnius City Municipality**

The Vilnius City Municipality grants compensations for tuition fees to parents of children who attend private pre-school education institutions. To receive such compensation, AISV, the Vilnius City Municipality and Students' parents/guardians have to enter into a tripartite agreement. The following personal data is collected by AISV for the performance of this agreement: parent'/guardian' full name, Lithuanian ID personal code or birthdate, e-mail address, phone number, address, child's full name, Lithuanian ID personal code and date of birth.

This data is processed for the performance of the agreement and will be kept for 5 (five) years after the date of the agreement. A list of Students eligible for compensation, containing Student's full name, date of birth, date of the agreement, and attendance for the month will be transferred to the Vilnius City Municipality by AISV on a monthly basis.

#### **4.14. When AISV issues invoices for tuition fees**

In order to issue invoices for tuition fees, AISV processes the following personal data: full name of the person or title of company responsible for paying of the invoice, citizenship of the person, passport number, permanent place of residence, phone number, e-mail address, contact person/company name for sending invoices. This personal data is processed for the performance of the agreement and will be kept for 10 (ten) years from the date of the invoice.

#### **4.15. When conducting staff recruitment**

AISV collects and processes prospective staff candidate's curriculum vitae (CV) and/or motivation letter and/or other information (your job place, e-mail address, date of birth, address, education, full name, phone number, desired position, CV receipt date, personal qualities, job experience: last job place, length of employment and position there, other professional experience, knowledge of foreign languages: language, reading, writing and speaking skills, ability to work with various computer programs, other information and reasons for applying, desired salary) and/or whatever other information that you may submit in order to participate in the recruitment process. This information is processed on the basis of candidate's consent which is deemed given by an applicant when sending AISV your CV and/or motivation letter. If a candidate does not provide his/her CV and/or motivation letter, AISV will not be able to evaluate his/her suitability for the position.

In the event that a candidate does not give his/her separate consent to process personal data upon completion of the recruitment process, AISV undertakes to delete and/or destroy your personal data within 3 (three) months after signing an employment contract with the selected candidate.

AISV will keep prospective staff personal data based on their consent for the period of time indicated in the consent.

#### **4.16. When AISV performs contracts with legal entities**

In furtherance of its legitimate interest to ensure fulfilment of contracts between AISV and its contracting partners who are legal entities, the Data Controller processes personal data of employees of such legal entities, i.e. full names, e-mail addresses, phone numbers and the contents of their communication. This data will be kept for 10 (ten) years.



#### **4.17. When AISV manages contracts with suppliers**

In order to manage contracts with suppliers, AISV processes the following personal data on the basis of the contract: contact persons' full names, contact details, contents of communication, contract information, etc. This data will be kept for 10 (ten) years.

#### **4.18. When AISV carries out video surveillance**

AISV carries out video surveillance of the school territory (including a parking lot) on the grounds of the legitimate interest to protect persons and property against theft or damage, or other violations, to capture and preserve evidence of incidents, to investigate such incidents and to ensure identifiability of any violations made. To carry out video surveillance, the following personal data is processed: the overall image entering the field of observation, which may include images of persons, location and movement through the areas covered camera, available assets, behavior and other relevant information (date, time).

Only authorized employees approved by the Director's Order and the video surveillance service providers (UAB Eproma) have access to the collected data. The area and premises are marked with information signs warning that territory and premises of the AISV are under video surveillance.

#### **4.19. AISV website and cookies used**

When visiting AISV website, cookies may be download cookies on visiting person's device. Cookies are small, often encrypted text files which are placed on visiting person's browser or hard disc on the basis of person's consent. AISV uses different cookies for different purposes as they help AISV identify people among other AISV website users. This allows AISV to make

visitors 'experience of using AISV website more pleasant and to improve it.

The majority of browsers allow visitors to disable all cookies, while some browsers make it possible to block only third-party cookies, and such possibilities will be given to the visitors. However, it should be kept in mind that disabling all cookies may adversely affect visitor's use of the website because not all of the services provided on our website will become available to you.

You may find more information at :

[AllAboutCookies.org](http://AllAboutCookies.org) or

[http://www.google.com/privacy\\_ads.html](http://www.google.com/privacy_ads.html)

uses the following cookies:

##### **a - Strictly necessary cookies**

These cookies are essential for AISV website to operate. Such cookies process data on the basis of proper performance of the agreement when a person visits the website, while we ensure the safety and quality of such visit. Cookies that allow visitors to log in to access secure areas of our, or to use electronic accounting systems are examples of strictly necessary cookies.

##### **b - Analytical and/or performance cookies**

They allow to recognise and count the number of visitors and to see how visitors move around AISV website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users easily find what they are looking for. Data collected by these cookies is processed on the basis of your consent.

##### **c - Functionality cookies**

These cookies are used to remember choices a visitor made in the past when he/she re-visits AISV website so as to provide you personalised or enhanced features that you select. Data collected by these cookies is processed on the basis of you consent.

You may find a detailed list of the cookies below:

COOKIE NAME	DATA PROCESSING PURPOSE COOKIE USE	CREATION MOMENT	EXPIRATION TIME	COOKIE TYPE Stricly necessary Analatycal Functionality Marketing	DATA USED
<b>CMSSSESSIDX</b>	A standard cookie used to maintain user sessions	When entering the website	When the website window is closed	Functionality	IP address, unique ID
<b>COOKIES AGREE</b>	A cookie used to identify whether you accept cookies on our website	When consent is given	When deleted	Functionality	IP address, unique ID
<b>COOKIES LEVELX</b>	A cookie identifying which cookies are allowed to be used on our website	When consent is given	When deleted	Functionality	IP address, unique ID
<b>_gat</b>	This cookie is used by Google Analytics to collect statistical information about the website traffic	When first entering the website	At the end of session	Functionality	IP address, unique ID
<b>_ga</b>	This cookie is used by Google Analytics to evaluate purposes of user visits, to produce website traffic reports to website operators and to improve user experience when visiting the website	When consent is given	After 2 years	Analytical	IP address, unique ID
<b>_gid</b>	This cookie is used by Google Analytics to identify users	When first entering the website	After 2 days	Analytical	IP address, unique ID

#### 4.20. When visiting AISV social media sites

Information communicated to AISV when visiting AISV Facebook account “The American International School of Vilnius” (including notifications, use of “Like” and “Follow” buttons and other communication)

will be controlled by AISV jointly with social media managers as joint controllers.

If you have any questions about how your personal data is processed on that social media site, please read their privacy policy at <https://www.facebook.com/privacy/explanation> and contact the service provider directly.

## 5 - DISCLOSURE OF PERSONAL DATA

School receives student, family and staff personal data from their devices, social networks (Facebook), the Ministry of Education and Sports, public registers and from other sources. The school requests the parents provide annual health forms that are issued via electronic healthcare services system.

School may disclose students' or employees' information to agents and such service providers as debt administration/collection companies or companies providing archiving services, also to providers of marketing/IT services or subcontractors if it is reasonably required for the purposes stated in this Privacy Notice.

In addition, AISV may disclose your information in the following cases:

- If required to do so by law;
- In order to protect AISV rights or interests (including the case when personal data is disclosed to others for debt recovery purposes);

For the purposes indicated in this Privacy Notice, student and family personal data may be transferred by AISV to organizational committees of third parties hosting international events or trainings, also to Embassies, travel agencies, etc. Depending on such third party, transfer of personal data may be made on the basis of an adequacy decision envisaged in Article 45.3 of the General Data Protection Regulation ("GDPR") or on the basis of your consent (Article 49.1(a) of the GDPR), or for the performance of a contract (Article 49.1(b) or (c) of the GDPR).

We do not transfer personal data to other parties except as specified in this Privacy Notice.

The list of recipients (including their categories) contained in this Privacy Notice is subject to change. Therefore, if you wish to be informed of any such change, please let us know by sending an e-mail at the address given in this Privacy Notice saying that "I wish to be informed of any change of my personal data recipients" and giving your full name.

## 6 - SAFETY OF YOUR PERSONAL DATA

Student, their parent and staff personal data will be processed in accordance with the GDPR, the Law of the Republic of Lithuania on Legal Protection of Personal Data and other legal acts. During the data processing,

AISV will implement appropriate technical and organizational measures for protecting personal data from accidental or unlawful destruction, modification, disclosure or any kind of illegal handling.

## 7 - YOUR RIGHTS

This section gives information about your rights associated with the processing of your and your children's personal data by AISV and about how such rights may be exercised. If you want more information about your rights or want to exercise them, please contact us at the e-mail address given in this Privacy Notice.

Information on how your request is being processed will be given by AISV without undue delay, yet no later than within 1 (one) month after such request for the exercise of your rights was received by AISV. The above period may be extended for another 2 (two) months depending on how complicated the request is and how many of such requests have been received. Should that be the case, AISV will let you know if the period has been extended and for what reasons within 1 (one) month after receiving your request. AISV may refuse to implement your rights solely in the cases specified by law.

### 7.1. Right of access to your personal data

In order for a person to understand how AISV uses your or your children's personal data and to suffer no inconvenience on that account, you may contact AISV at any time to ask whether any of your or your children's personal data is processed by us. If your or your children's personal data is stored or used by us in whatever way, you have the right of access to such data. In order for you to exercise such right, please send us your written request at the e-mail address given in this Privacy Notice. We may ask you to confirm your identity in order to grant your request, which should be submitted by you acting reasonably and in good faith.

### 7.2. Right to withdraw consent

Once parents or staff has given AISVs their explicit consent to process their and their child(-ren)'s personal data, it may be withdrawn by staff of the parents at any time by sending AISV an e-mail at the address given in this Privacy Notice.

### 7.3. Additional rights

Below, please find information about additional rights that may be exercised by a person as follows:

**(a)** A person has the right to request AISV to correct any inaccuracy of your personal data. In that case, we may ask you to confirm the corrected information.

**(b)** A person has the right to request AISV to erase your personal data. This right may be implemented in the cases described in Article 17 of the GDPR.

**(c)** A person has the right to request AISV to restrict/refrain from processing his/her or his/her child(-ren)'s personal data in the following cases:

- during the period needed for AISV to ascertain whether your or your children's personal data is accurate when you file a complaint regarding its accuracy;
- when your or your children's personal data collection, storage or usage by us is illegal but you decide not to request such data erasure;
- when we no longer need your or your children's personal data but such data is needed by you in order to impose, enforce or protect legal demands;
- during the period needed for us to determine whether we have another valid legal basis for further processing of your or your children's personal data if you have opted to exercise your right to object to such personal data processing.

**(d)** A person has the right to data portability if processing of such data is carried out by automated means and we have obtained such data from you based on your consent or for the purpose of concluding the agreement. If a person opts to exercise this right, AISV will transmit at your request a copy of the data submitted by you.

**(e)** A person has the right to object to processing of your or your children's personal data pursuant to Article 21 of the GDPR.

#### **7.4. Right to request more information**

We hope you understand that it is very difficult to discuss all possible ways how personal data may be collected and used. Therefore, we endeavour to provide as clear and complete information as possible and undertake to update this Privacy Notice if changes are made to the use of personal data. Nevertheless, if you have any questions regarding your personal data use, we will be happy to answer them or to provide you with further information that we are allowed to disclose. Please contact us if you have any specific questions or have not understood the information presented in this Privacy Notice.

## **8 - COMPLAINTS**

Please immediately contact us at the e-mail address given in this Privacy Notice if you believe that your or your child's (as the data subject's) rights are and/or may be violated. We ensure that having received your complaint, we will inform you within a reasonable time about the progress of the

complaint investigation and later about its outcome.

If you are not satisfied with the investigation outcome, you may file a complaint with the supervisory authority, i.e. the State Data Protection Inspectorate ([www.vdai.lrv.it](http://www.vdai.lrv.it)).

## **9 - RESPONSIBILITY**

You are responsible for the confidentiality of your or your children's data submitted and for ensuring that such data is accurate, correct and complete. You should inform us immediately by e-mail if changes are made

to the data you have submitted. Therefore, we will not be held liable for damage resulting from your failure to provide correct or complete personal data or to give us notice of changes made to such data.



## 10 - CONTACT US

You may contact AISV in the following ways: by phone or e-mail. We ourselves receive, review and answer all messages. Whenever you contact us, we may process the following data: your first name, last name, e-mail address, phone number, date and the text of communication. Such data will be processed in order to give answers to your questions. If you do not provide your contact details, we will not be able to contact you.

Communication messages will be retained for 1 (one) year after receipt except for the

information which is subject to another retention period pursuant to this Privacy Notice or the laws.

All personal data submitted in the course of our communication will be used solely as described above for reviewing messages and for managing and administering communication flows.

Please note that we may need to contact you by regular post or e-mail or phone. Please let us know if changes are made to your personal data.

## 11 - CHANGES IN OUR PRIVACY NOTICE

We may update or amend this Privacy Notice at any time. Such updated or amended Privacy Notice will take effect from the date of being published on our website. You should check our website occasionally to make sure that you see the latest version of our Privacy Notice. Each

time our Privacy Notice is updated, we will inform you of all changes that we deem significant by posting them on the website. You may look at the “Update Date” listed at the bottom to find out when the Privacy Notice was last updated. This Privacy Notice was last updated on June 25, 2020.