

Little Genius International Srl Sb Privacy Policy – GDPR UE 2016/679

Little Genius International SRL SB is committed to protecting your privacy, including your personal data. This Policy sets out the terms on which we will hold and process any personal data that we hold as a data controller. If you have any queries about this Policy or how we use your data, you can contact us using the contact details below. *Please read this Policy carefully.* By contracting with us, unless we are acting as your data processor, you acknowledge that the personal data you supply us will be used in accordance with this Policy.

When Do We Collect Information?

We will collect information from you or the student you have legal custody when you become our client, employee or supplier, or contact us in person, by telephone, by e-mail, by post, by fax or by social media. We also collect information from you when you voluntarily complete client surveys, enter a competition or promotion, provide feedback or complete a contact form on our website or on premises. We use Google Analytics to analyze the use of our website by means of cookies (such as your IP address and other browser-generated information). We may collect the following information:

- Your contact details, such as name, address, telephone number and email address
- Your date of birth, nationality, country of birth, country of residence, employment status and tax identification number (i.e. Fiscal Code)
- Identity documents details, passport, id card, driving license
- Details of any goods or services you sell to us, or ask us to supply
- Details of your credit history and any records held by financial crime prevention agencies
- Details of your employment status, income and source of wealth if requesting financial support from the school

All the above detail regarding the students attending or willing to attend our school, such as demographic information, medical certificates, school attendance, report cards, academic records, identity documents of family members

Children

If you are a parent, Personal Data of children under the age of 18 will be processed in line with legal requirements and this policy only if authorized by the parent or adult holding the legal custody of the child.

How We Will Use Your Information

We use information held about you in the following ways:

- to comply with our contractual obligations to you;
- to help protect your information and prevent unauthorized access to it;
- to deal with any queries, complaints or problems reported by you;
- for payment verification, debt tracing and debt recovery;
- to enable you to participate in all our school activities;
- to enable you to participate in the interactive features of our online platforms and to ensure that content from our website is presented in the most effective manner for you and your computer/device;
- to generate statistics relating to use of our website and our school;
- to provide you with information about activities (by mail, telephone etc.), administrative and other daily issues, other goods or services we offer or you enquired about. You may opt out of receiving this information when we collect your details or at any time by contacting us using the following contact details or the functions provided in the communications: dpo@littlegenius.it
- if required to do so by law and to the extent necessary for the proper operation of our systems, to protect us/our customers, or to enforce the terms of any contract that we have entered into with you;
- to notify you of changes to our terms of business

Our use of your personal data will be for one or more of the legitimate interests described above.

Disclosure of Your Information

We may disclose your information:

- to businesses that are part of the same group of companies as us, or that become part of that group;
- to our IT providers and others who provide us with support services (such as software integration partners) so that we can comply with our contractual obligations to you;
- to our appointed accountants, lawyers and other professional advisers (including our bankers), to the extent that they require access to the information in order to advise us;
- to credit reference agencies and organizations to allow us to undertake the checks set out below;
- to debt collection agencies or to the Court;
- if required to do so by any legal requirement;
- to law enforcement agencies and others in order to investigate or prevent fraud or activities believed to be illegal or otherwise in breach of applicable laws;
- if we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers and suppliers may be one of the transferred assets.

We will not disclose your information to third parties other than as outlined above.

Credit and Identity Checks

As part of our contracting process we may carry out automated checks using your personal data, such as your name, postal address, date of birth, telephone numbers and employment status. This information may be used by us to prevent fraud and money laundering, for example, when processing applications for credit, managing credit or for debt recovery.

Storage of Your Personal Data

We will only keep your personal data for as long as we need to in order to fulfil the purpose(s) for which it was collected, as set out above in this Policy, and for as long as we are required to keep it by law. We retain personal data collected in connection with the performance of our contractual obligations to you and the information provided to us for identity and anti-money laundering checks. You may require us to delete personal data once that period has expired unless we are required to retain that personal data for a longer period by law.

Security

We take appropriate security measures (including physical, electronic and procedural measures) to help safeguard your personal information from unauthorized access and disclosure. We may transfer, or allow access to, your information internationally including to countries outside the European Economic Area (EEA) when performing our contractual obligations to you. We will ensure that your personal data is adequately protected when it is transferred outside the EEA in accordance with applicable data protection laws. You can update your personal data by contacting us.

Cookies

Our website uses cookies to distinguish you from other users to enable us to provide you with a better experience when you browse our website and to allow us to improve our site. We use cookies to keep track of which pages are most popular, which method of linking between pages is most effective and to help identify and address problems with the use of our website that arise from time to time.

Your Rights

You have the following rights which can be exercised by contacting us using the details provided below:

The right:

- to ask us not to process your personal data for marketing purposes;
- to access personal information held about you and to obtain a copy of it
- to prevent any processing of personal data that is causing or is likely to cause unwarranted and substantial damage or distress to you or another individual;
- to obtain the rectification or completion of personal data which are inaccurate or incomplete;
- to restrict or object to the processing of your personal data and to request its erasure under certain circumstances;
- in certain circumstances, to receive a copy of your personal data in a structured, commonly-used and machine readable format and the right to require us to transmit that data to another data controller where technically feasible;
- to be informed about any use of your personal data to make automated decisions about you, and to obtain meaningful information about the logic involved, as well as the significance and the envisaged consequences of this processing;
- to lodge a complaint about the way in which your personal data is being used; and
- to withdraw your consent to any use by us of your personal data otherwise than for one of the legitimate purposes set out above.

Changes to Our Privacy Policy

We reserve the right to amend this Policy at any time. Any substantive changes we make to our Policy in the future will be notified to you in writing, but we would advise you to check our website regularly to ensure that you are familiar with the most up-to-date version.

Contacting Us

If you have any queries, comments or requests regarding this Policy or would like to exercise any of your rights set out above, you can contact us at:

- Email: dpo@littlegenius.it
- By Telephone: 0039 0697245148
- By Post: Little Genius International Srl Sb – Via di Grotte Portella, 28 – 00044 Frascati (RM) Italy