



## Privacy Policy

### 1. Purpose

Marymount International School Rome is committed to full compliance with all legal requirements regarding the processing of personal data.

The purpose of this Policy is to establish the steps taken by the School to protect the personal data it processes as part of its daily operation.

In case of a conflict or ambiguity between the provisions set forth in the EU Regulation no. 2016/679 (General Data Protection Regulation, hereinafter “GDPR”) and this Policy, the provisions in GDPR shall prevail over this Policy.

This policy shall not create any additional obligations under applicable law nor restrict any mandatory provisions thereof.

### 2. Scope

This Policy applies to all internal and external parties whose personal data is processed by the School, or with access to personal data as part of their relationship with the School.

The Controller is *Procura Generalizia delle Suore del Sacro Cuore di Maria Vergine Immacolata*, managing body of Marymount International School, having its registered office in Roma, Via Nomentana no. 355.

### 3. Definitions

#### *Personal Data*

Any information relating to an identified or identifiable natural person (*‘data subject’*). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

#### *Special Categories of Personal Data*

Any personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership and genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a natural person’s sex life or sexual orientation.

#### *Data Protection*

The technical and organizational measures put in place by the School to ensure the processing of personal data in compliance with the law.

#### *Data Processing*

Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission,

dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

#### *Data Classification*

The ranking of different types of personal data based on their inherent sensitivity, in order to ensure an appropriate level of data protection.

#### *Disclosure*

Marymount's legal obligation to disclose to the person concerned that the School is processing her or his personal data. The person concerned has the right to know how the data is processed and protected.

#### *Consent*

Marymount's legal obligation to obtain explicit and unambiguous consent from a person concerned before processing her or his personal data. If the person concerned is a minor, consent is required from the holders of parental responsibility over the person.

#### 4. Policy Statement

Marymount International School ensures that appropriate measures are in place to protect all personal data processed as part of the School's daily operation, and that any processing of personal data is done in compliance with the relevant applicable legislation.

The relevant pieces of legislation are listed in section 9 of this policy and require that, among other points, personal data be processed lawfully, be processed only for a specific and limited purpose, and be processed in an appropriately secure manner.

Marymount International School may process special categories of personal data as a controller to the extent allowed under the GDPR, and where relevant, as authorized under EU law or Italian law.

The School processes special categories of personal data if:

- it is indispensable for recruitment to a specific job, or
- to fulfil legal obligations related to the employment contract

Processing of special categories of personal data is performed within the limits laid down by Italian law, and in accordance with appropriate safeguards aimed at preventing the risks that the processing of such sensitive data may present to the interests, rights, and fundamental freedoms of the employee concerned, notably a risk of discrimination.

#### 5. How the School uses Personal Data

Marymount International School uses personal data in order to:

- manage all aspects of a student's education at the School, including, but not limited to, delivering educational programs by assigning students to the correct grade, class, or course; monitoring the academic progress of students and reporting this progress to parents; monitoring the pastoral development of students; ensuring dietary requirements are accommodated in the lunch program; and corresponding with families.
- manage all aspects of an employee's employment relationship, including, but not limited to, payroll, benefits, corporate travel and other reimbursable expenses,

development and training, absence monitoring, performance appraisal, career development, disciplinary and grievance processes, and other general administrative and human resource related processes;

- comply with any law (including health and safety laws, judicial or administrative orders, etc.).

## 6. Data subjects' rights

Data subjects are entitled at any time to exercise the rights as explained in Article 12-21 and 34 of the GDPR and as per Italian law (Section 7 of Legislative Decree no. 196/2003).

## 7. Procedures

The measures implemented by the School to protect personal data are organizational and technical in nature. These are summarized below and are described in further detail in the Privacy Procedures document.

### *Organizational Measures*

- a) Specific data protection roles and responsibilities assigned to employees. (See section 8 for further information.)
- b) Letters of disclosure or consent distributed to all impacted parties.
- c) Continuous education and training regarding privacy and data protection.
- d) Employee compliance with the internal Code of Conduct.

### *Technical Measures*

- a) Inventory and classification of personal data processed by the School.
- b) Risk assessment of scenarios with potential impact on personal data.
- c) IT controls around logical and physical access to data, and backup and recovery.
- d) Employee compliance with the general IT procedures.

## 8. Responsibilities

The following specific roles and responsibilities are assigned to enforce this Policy.

### *Data Controller*

This role has ultimate responsibility for the processing of personal data by the School in accordance with this Policy. The Data Controller role is assigned to the Head of School through written delegation from the legal representative of the *Procura Generalizia delle Suore del Sacro Cuore di Maria Vergine Immacolata*.

### *Data Manager*

This intermediary role is assigned to employees with direct supervision of the processing of personal data in each of the School's organizational units. The Data Manager role is assigned by letter of appointment from the Data Controller. The Data Manager role is assigned to the Elementary School Principal, Secondary School Principal, and Operations Manager.

### *Controller*

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

#### *Processor*

The natural or legal person, public authority, agency or other body which processes personal data on behalf of the Data Controller.

#### *Internal Data Processor*

This role is assigned to Marymount employees whose job duties include the processing of personal data. The Internal Data Processor role is assigned by letter of appointment from the Data Manager.

#### *External Data Processor*

This role is assigned to external entities whose relationship with the School involves the processing of personal data. The External Data Processor role is assigned by letter of appointment from the Data Manager.

#### *Systems Administrator*

This role is responsible for the administration of the School's IT systems to ensure that any processing undertaken by the systems is in accordance with this Policy. The Systems Administrator role is assigned by letter of appointment from the Data Manager. The Data Manager role is assigned to the Technology Manager.

## 9. References

### *Legal References*

- Italian "Privacy Code" (Decree 196/2003), currently in effect, including Technical Guidelines in Appendix B.
- European "General Data Protection Regulation" (GDPR) (UE 2016/679), which will take effect from May 25, 2018.

### *Other Marymount documents*

- Privacy Procedures
- IT Procedures
- Employee Code of Conduct

## 10. Questions and concerns

Any questions regarding the content of this Policy should be directed to the Operations Manager. The School is usually able to resolve privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive, you may contact the Italian Supervisory Authority (*Garante della Privacy*), in Rome, Piazza di Monte Citorio n. 121.

## 11. Record of Approval

This Policy was reviewed and approved by the Board of Regents in February 2018.

This Policy will next be reviewed in February 2019.