

"Professors" privacy policy



1. Data controller

The **Fondazione Centro di Musicologia Walter Stauffer**, whose office is registered in Cremona - Corso Garibaldi n. 178, VAT and tax code 00319130191, hereinafter referred to as the "**Controller**", guarantees compliance with regulations for the protection of personal data by providing the following information on data processing, pursuant to art. 13, EU Regulation 2016/679 (General Data Protection Regulation - GDPR) and subsequent amendments.



2. Data processed, purposes and legal bases for processing

The types of data collected, both from the teacher and from his family, can be:

- common personal data;
- particular data relating to the state of health, suitability, membership of a trade union, etc.;
- images and videos.

Personal data, common and particular, are processed for the following purposes:

- a) for hiring purposes (where this has not already occurred);
- b) for salary processing and payment;
- c) for the fulfillment of all practices required by existing law concerning work safety, privacy and environmental security;
- d) for the fulfillment of legal and contractual obligations, including joint projects, relating to the employment relationship

and will be subject to processing based on principles of fairness, lawfulness, transparency and protection of the employee's privacy and rights.

Concerning the employment relationship, the foundation may process data that the law defines as "specific" as it is suitable for identifying, for example:

- an employee's general state of health (so as to verify absences due to illness, maternity, accident or an obligatory work period), whether or not an employee is suitable for certain tasks (as communicated by medical personnel following preventive / periodic medical examinations or as requested by the employee her / himself);
- membership in a labor union (responsibilities and / or requests for deductions of fees), membership in a political party or the holding of elected public offices (special permissions or leave of absences), religious beliefs (religious holidays as recognized by law).

Data of a sensitive nature, concerning an employee's state of health, which a competent doctor may collect for carrying out duties provided for by Legislative Decree 81/08, and other provisions concerning hygiene / safety in the workplace, or in carrying out preventive and periodic medical examinations, will be processed

by the employer exclusively in collaboration with the same doctor, who is her / his own independent data controller, requiring the Controller to ask for prior consent.

Only judgments concerning the unfitness of an employee will be communicated by the doctor to the employer.

The Data Controller could also evaluate the production of audio/video material in which the interested party appears to be used for informational/promotional purposes both in paper format (brochures, leaflets, flyers, catalogues, etc.) and digital (website, social channels, average, etc.). The use of images is subject to compliance with current regulations on the matter and not to damage the dignity, decorum and personality of the interested party. The production and use of the images are to be considered carried out completely free of charge and nothing will be claimed or owed as financial compensation. Before publishing images or videos depicting the teacher, the Data Controller will send advance notice to the teacher concerned in order to guarantee maximum transparency.

The legal bases that legitimize the processing of data are:

- the execution of obligations deriving from an employment contract (for example if the data is processed for the purpose of processing pay slips) or the execution of pre-contractual measures adopted at the request of the same;
- the fulfillment of obligations established by law (for example if the data is processed to make a tax calculation or adjustment);
- the legitimate interest of the employer (which may be the prevention of damage or losses, or the improvement of company productivity);
- the consent of the interested party for the dissemination of any audio/video material produced.



3. Nature of the provision

The provision of data is mandatory due to legal obligations, therefore any refusal to provide it in whole or in part may make it impossible for the Data Controller to provide the requested service, execute the contract or correctly carry out related obligations concerning payment, fiscal responsibilities, taxes or insurance, with regard to the employment relationship.



4. Places and methods of processing and data retention periods

The data collected by the site is processed at the headquarters of the Data Controller.

The data collected is also stored in the data centers of the provider of advanced Microsoft cloud services including e-mail, calendars, etc.

Microsoft Corporation adheres to the principles of the Privacy Shield frameworks between the European Union and the United States and Switzerland. Specific information relating to Microsoft's compliance with EU Regulation 2016/679 (General Data Protection Regulation – GDPR) is available at the link

<https://www.microsoft.com/it-it/trust-center/privacy/gdpr-overview>

The data collected will be processed using electronic or, in any case, automated, IT or digital means, or through manual processing, in all cases only for the purposes for which the personal data was collected and while guaranteeing the safety of the subject.

The data provided will be stored, according to the "storage limitation principle" (art. 5, EU Regulation 2016/679) for the entire duration of the employment relationship and, subsequently, within the limits of legal obligations, notwithstanding deferred payment of fees that might justify its extension.

Verification of the obsolescence of stored data is carried out periodically.

In all cases, the Data Controller applies rules that prevent the storage of data indefinitely and therefore limits the storage period, in compliance with the principle of minimization of data processing.



5. Entities authorized to process data, supervision and communication of data

Data processing is carried out by the Data Controller's staff, those identified and authorized to process data according to specific instructions as provided for by existing law.

The data collected, within the limits provided for, and to the extent that the processing of data is necessary or instrumental for the execution of the same, may be processed by third parties appointed as external data controllers, or, if necessary, communicated to subjects where necessary for the purposes outlined in point 2, for example:

- Employment consultants and / or firms specialized in the processing of salaries, their employees and collaborators, as external agents or managers;
- Professionals or service firms involved in business administration and management, who work on our behalf.

It may also be processed, on behalf of the Data Controller, by professionals and / or firms commissioned to carry out technical, development, management and administrative / accounting services.

Notwithstanding communications made to fulfill legal and contractual obligations, all data collected and processed may be communicated in Italy and transferred abroad exclusively for the purposes specified above to:

- Public institutions (INPS, INAIL, provincial labor directorate, tax offices ...);
- Funds (including private pension and assistance funds);
- Medical offices (in fulfillment of obligations concerning hygiene and safety in the workplace);
- Insurance companies and credit institutions;
- Labor union organizations to which the employee has given a specific mandate;
- Matching funds;
- Business organizations to which the foundation belongs.

The data collected may be turned over in the event of a legitimate request, only in those cases provided for by law, by the proper judicial authorities.

In no case and for no reason will data be disseminated in any way.

The data processors and individuals responsible for its processing are identified in the Privacy Document, which is updated periodically.



6. Data transfer to non-EU countries

Collected data will not be transferred abroad.



7. Rights of the data subject

In relation to the personal data communicated, the data subject has the right to exercise the following:

- (Article 7.3 EU Regulation 679/2016 - GDPR) withdrawal of consent;
- (Article 15 EU Regulation 679/2016 - GDPR) right of access by the data subject;
- (Article 16 EU Regulation 679/2016 - GDPR) request rectification;
- (Article 17 EU Regulation 679/2016 - GDPR) request erasure ("right to be forgotten");
- (Article 18 EU Regulation 679/2016 - GDPR) right to restriction of processing;
- (Article 20 EU Regulation 679/2016 - GDPR) receive data in a structured format, commonly used and machine-readable, for the purpose of exercising the right to portability;
- (Article 21 EU Regulation 679/2016 - GDPR) objection to processing.

The subject can exercise her or his rights, as well as request more information relating to her or his personal data, by sending an e-mail to privacy@stauffer.org specifying the content of the request in the subject field.

Requests relating to the subject's rights will be processed without undue delay and, in any case, within one month of the request; only in cases of particular complexity or multiple requests can this deadline be extended by a further 2 (two) months.

We remind you that it is your right (pursuant to art. 77 of EU Regulation 679/2016 – GDPR) to lodge a complaint with the Guarantor for the Protection of Personal Data, whose contact details are available [here](#).

Last update: June 28, 2024

DECLARATION OF CONSENT

The interested part (*insert name and surname*)

having read and understood this information in all its parts, I consent to the processing of personal data (images and videos) for the purposes indicated in point 2.

DATE: SIGNATURE: