

INTRODUCTION / PREAMBLE

By Regulation (EU) 2016/679, containing provisions for the protection of individuals regarding the processing of personal data, Conservatorio di Musica "Giuseppe Verdi" with headquarters in Via Conservatorio, 12 – 20122 Milano (hereinafter called the "Organization") as a data controller, it is required to provide certain information regarding the use of personal data. The representative of the Data Controller is the President at the time appointed. This is without prejudice compliance by the organization of the existing rules on transparency and mandatory publication of data and documents.

DATA SOURCES AND TYPOLOGY OF PROCESSED DATA

The personal data of staff acquired by the organization can be collected:

- directly from the data subject (for example during the employment relationship or supplied in the course of the specific services requested, also through online services)
- at/with third parties in the event where any organization acquires data for the purpose of using them for the pursuit of the institutional purposes

For data collected not directly from the data subject, this disclaimer is provided upon registration and no later than the first communication. The processed data, where the relationship in place so requests, include: personal details and specific information such as sensing / judicial data. The provisions of Law 300/70 and subsequent modifications also remain firm, as well as the provisions of art. 6 of Law 135/90

It may happen that, in the fulfillment of specific obligations relating to the employment relationship management (eg. accounting, payment, social security, welfare and tax) the organization comes into possession of "sensitive information" which may possibly be inferred the racial or ethnic origin, religious belief, political opinions membership of parties, unions, associations or organizations of a religious, philosophical, political or trade union, as well as the state of health (eg. certificates of illness and injury, pregnancy certificates, trade union delegations, minority group membership, participation in representative bodies of workers, results of medical examinations carried out in accordance with law and contract, exercise of public office, etc.), as well as sensitive and / or judicial data that detect as part of any disciplinary proceedings initiated against the staff and, in general, in the pending cases before all courts involving staff.

In any case, all data are treated in the pursuit of the institutional purposes related to the establishment and execution of the employment relationship in compliance with the above Act and the privacy obligations that have always guided the organization's operations.

PERIOD OF DATA STORAGE



The data is stored only for the period necessary for the purposes for which they are processed, or in the terms provided for by laws, national and EU rules and regulations to which the organization has to follow (eg. As accounting or tax laws, etc.).

Periodic checks are expected to be carried out on the processed data and the possibility of being able to delete if no longer needed for their intended purposes

DATA CONFERMENT AND CONSEQUENCES OF NOT PROVIDING / MISSED PROVIDING

MANDATORY/ NOT MANDATORY



The provision of data to be considered mandatory for what concerns the treatment that the organization must do to meet its institutional obligations towards the party concerned on the basis of the relationship, as well as legal obligations, rules, regulations. Failure to provide such data will make it impossible for the organization to act on the existing relationship or to provide the requested service.

The purposes for which it is mandatory to provide the data is marked with the following symbol:



The consent is not required for any other purpose and, even when given, may be revoked at any time by the person concerned.

The purposes for which it is NOT mandatory the provision of data is marked with the following symbol:



PURPOSE OF DATA PROCESSING



The data is processed in the normal activities of the organization and for the following institutional purposes:

Purposes strictly connected and instrumental to the employment relationship management in any form (eg internships, administration, subordinate, etc.) and management / organization of typical organization's activities (eg. Forwarding organizational communications-related activities, systems organization management, provision of staff training services deemed necessary by the organization in order to competently carry out its activities, communications management in the organization and management of the activities of the organs of the institution, retention of data for purposes of establishment of a historical archive, etc.), including the aim of legitimate interest or related administrative duties, accounting and tax-related obligations under applicable laws, regulations and legislation, and provisions issued by authorities legitimated by law and by the vigilance and control (eg. accounting, pay, social security, welfare, tax, etc.).

In reference to the possible processing of sensitive and judicial data, the overriding public interest purposes could be the following: establishment and management by public entities of any type of labor relationship, employee or self-employed, even unpaid, honorary or time partial or temporary, and other forms of employment that do not involve the establishment of an employment relationship; application of the rules relating to the granting, validation, modification and revocation of economic benefits, concessions, donations, other emoluments and entitlements;

Management of any litigation, court and / or consultancy activities. In this context, any sensitive and legal data can be used for the following purposes in the substantial public interest: application of the rules on administrative sanctions and appeals; enforce the right of defense in administrative or judicial; verification of the legality, of good performance, the impartiality of the administration, as well as the compliance of such activities to the requirements of rationality, economy, efficiency and effectiveness for which however, entrusted by law to public functions of control subjects, striker and inspection in relation to other subjects; establishment and management by public entities of any type of labor relationship, employee or self-employed, even unpaid, honorary or time partial or temporary, and other forms of employment that do not involve the establishment of an employment relationship.

Any institutional communications, to pursuit the purposes explicated in the Statute, made via text / photo / audio / video material on electronic media (eg. via internet) or traditional media (eg. the press, news, brochure, etc) regarding the managed activities / initiatives by the organization that may contain data and images / video / audio containing the person concerned explicitly collected for example also by means of interviews, narration of case studies, events, etc;

DATA PROCESSING MODALITIES



The processing of personal data takes place through manual, computer and telematic tools with logic strictly related to the purposes and in any event so as to ensure the security and confidentiality of the data. The filing of the documentation is done both electronically and on paper. Here are some essential information.



The collection of personal data is limited to the minimum necessary for each specific purpose of the processing



The processing of personal data is limited to the purposes for which it was collected



The storage of personal data is limited to the minimum necessary for each specific purpose of the processing

DATA PROCESSING MODALITIES



Sensitive personal data collected and processed in electronic form are stored in encrypted form



No personal information provided to third-party commercial



No sale nor lease of personal data

SCOPE OF DISSEMINATION AND CATEGORIES OF PEOPLE



Personal data will be known and processed, in accordance with current legislation, by the institution's staff, identified as in charge, in service at the relevant facilities. The personal data collected by the organization may be communicated, for the pertinent to the aforementioned purposes, also to the following subjects or categories of subjects:



Subjects (possibly abroad) to which communication is required by law, by regulation or by national and European legislation for the enforcement of contractual obligations or prior: for example, students in the management of the relationship and to the conditions contract provided for, government, ministries, Presidenza del Consiglio dei Ministri, police authorities and judicial, Inland revenue, Authority with expertise in health and safety at work, competent health care facilities for fiscal visits and for the assessment of ' suitability for use, banks, charities, social security, insurance and the like typically entities, insurance companies, bodies charged with establishing the service due and fair compensation, the competent bodies for the application of the rules obligatory employment, any outside parties for the management of the payroll service and contributions and advice in personnel management, appointed auditors and / or audit firms, entities that provide data processing services and performance consequential and complementary, counsel for the resolution of any legal problems relating to employment, trade associations, trade unions, individuals who are entrusted with the training of personnel services, bodies responsible for recruitment, etc



Legal, accounting work for study and resolution of any legal problems relating to the contractual position in place (for example, Avvocatura dello Stato, for the purposes of the criminal litigation, civil and administrative, judicial authorities of whatever order and able, referees, Administrations involved, for the management of extraordinary appeals to the President of the Republic, the judicial Police bodies, Tax Commissions, Provincial Offices of Labour for the purpose of mandatory settlement, freelancers, for the purpose of legal aid or advice, including those counterparty when due; insurance companies, in case of insurance policies containing such communications)



Third parties for purposes related to the activity educational / artistic (eg contractors, external organizations, etc)



All subjects any recipients of the organization's communication campaigns (for the purpose n.3)

MAIN LEGAL SOURCES



The data are used for the development of the institutional aims of the terms laid down in laws, regulations and national and EU regulations that the organization should follow. According to Regulation (EU) 2016/679, explicit normative references updated to their latest review state involving obligations or tasks on which could be possibly carried out the treatment of sensitive and judicial data, are available from the Data Controller, represented by the President at the time appointed. Such data may be disclosed as part of the pursuit of the intended purposes, only where required by law or regulation. It is without prejudice the communication or dissemination of data requested, in accordance with the law, police forces, judicial authorities, intelligence and security agencies or other public bodies, for purposes of defense or state security or the prevention, detection or suppression of crime.

Below are mentioned some reference standards as part of the employment relationship management: C.C.; Codice di procedura civile; R.D.1038/1933; L. 96/1955; D.P.R. n. 3/1957; D.P.R. n. 361/1957; L. 69/1992; D.P.R. 1124/1965; L. 300/1970; L. 336/1970; L. 6/12/1971 n. 1034; D.P.R. 1092/1973; L. 21.12.1999 n. 508; D.P.R.28.2.2003 n. 132; D.P.R. 395/88; D.P.R. 399/88; L. 8 marzo 1989, n. 101; L. 205/1990; L. 104/1992; L. 537/1993; D.P.R. n. 487/1994; D.Lgs. 81/2008; L. 335/1995; D.Lgs. 564/1996; L. 59/1997; D.M. 187/1997; D.P.R. 260/1998; L. 230/1998; L.488/1999; L. 68/1999; D.Lgs. 267/2000; D.lgs. 445/2000; D.Lgs. 165/2001; D.P.R. n. 461/2001; D.Lgs 151/2001; D.M. 31 gennaio 2001; D.P.R. 334/2004; DPR n. 670/1972; DPR n.752/1976; C.C.N.L.; Statuto dell'Istituzione; Regolamenti dell'Istituzione vigenti; L.152/1968; L. 113/85; D.M. 164/1999; D.P.R. 600/1973.

DATA SUBJECT'S RIGHT



At any time the data subject could exercise his rights against the data controller or data processor in accordance with Regulation (EU) 2016/679 by contacting the owner using the following contacts: privacy@consmilano.it – Conservatorio di Musica "Giuseppe Verdi" Via Conservatorio, 12 20122 - Milano (for written communications), represented by the President at the time appointed. To ensure the proper exercise of the rights, the person must make themselves identifiable unequivocally. The organization is committed to providing feedback within 30 days and, in case of impossibility to respect these times, to justify any extension of the deadline. The feedback will be free of charge except in cases of unfounded (eg. There are no data concerning the applicant concerned) or excessive demands (ie. Repetitive over time) which may be charged a fee not exceeding the actual costs incurred for the research conducted in this case. The rights referring to personal data concerning deceased persons may be exercised by those who have a personal or acts to protect or for family reasons deserving protection. The data subject has the right to lodge a complaint with a supervisory authority.

RIGHT TO GET ALL OF

RIGHT TO OBTAIN

- origin of the personal data
- categories of processed data
- the purposes and methods of treatment
- retention period
- the logic applied in case of processing with the aid of electronic instruments
- identity of the data controller, data processor
- subjects and categories of subjects to whom the personal data can be communicated or who can learn about them as managers or in charge even in Third Countries
- existence of the profiling process

- existence or otherwise of their personal data and that such data are made available in an intelligible form
- updating, correction or integration of data and limitation
- cancellation, anonymization or blocking of data processed in violation of the law (including those for which conservation is not necessary for the purposes for which it was collected and subsequently processed)
- confirmation that the transactions referred to in paragraphs above have been made known even to those to whom the data were communicated or disclosed, except where such compliance is impossible or involves a manifestly disproportionate to the protected right by the organization
- a copy of the processed data

RIGHT TO OPPOSE

- the processing of personal data concerning the data subject including profiling for legitimate reasons, even if pertinent to the purpose of collection
- the processing of personal data concerning him for the purpose of: sending advertising material, direct sale, conducting market research, commercial communications
- the processing of data processed for the purposes of historical or scientific research or statistical purposes except in cases of public interest in the treatment