



SACI PROTECTION OF PERSONAL DATA POLICY

Pursuant to the terms and conditions of Section 13 of D.Lgs. n. 196 of 30th June 2003 (*“Codice in materia di protezione dei dati personali”* – Personal Data Protection Law, hereinafter “the Law”) we hereby inform you that Studio Arts College International (hereinafter referred to as SACI), in its capacity as Data Processor in Italy, pursuant to Section 29 of the above Law, of the processing of your personal data and information, is required to provide you with the following information:

1. All personal data you have provided to SACI, as well as any entity from whom personal data are collected, and all additional data provided in order to allow SACI to plan and organize its study programs in Florence, Italy and thereof aimed at providing you with academic services, will be processed and handled by SACI in accordance with its policies and with the aforementioned Law and with the principles of fairness, lawfulness, transparency and protection of your privacy; Processing of sensitive data will only take place in relation to data regarding your health condition (such as diseases, allergies, food intolerances) or judicial data.
2. The data shall be processed exclusively for SACI’s institutional purposes, connected or related to the activities carried out by SACI, the accomplishment of bureaucratic practices for your entry in Italy, the performance of the contractual obligations of SACI in connection with your study abroad stay at SACI in Florence, Italy). In particular the data supplied will be processed for the following purposes:
 - a) To fulfill the obligations required by Italian or European laws or regulations
 - b) To fulfill contractual obligations regarding your enrollment at SACI (such as, but not limited to, course and program attendance, your health and safety)
 - c) In order to take action following an accident or aggression, using data provided by public authorities or hospitals. Sensitive data regarding your health and food habits will only be processed for the purpose of guaranteeing your safety or for fulfilling obligations required by Italian or European Union laws or regulations. Sensitive data regarding judicial measures which may have been provided to SACI by public bodies will be processed only for the purpose of guaranteeing your safety and complying with any applicable Italian laws.
3. Submission of personal data is necessary in order to achieve the purposes specified above.
4. Refusal to submit personal data will make it impossible to administer your academic or co-curricular activities in order to fulfill the contractual obligations of SACI in connection with your study abroad stay in Florence, Italy, as well as the obligations required by law.
5. Data of a common nature will be collected and processed automatically and/or manually in compliance with the provisions of Article 11 and 31 of the Italian Personal Data Protection Code and by adopting the related minimum safety measures, securing strictly monitored access; the collecting and processing of sensitive data will be carried out in compliance with the provisions of Art 11 and 31 of the Italian Personal Data Protection Code and by adopting the related minimum safety measures.
6. Data processing will take place, according to the aforementioned criteria, only within those offices of SACI which are exclusively dedicated to SACI study programs; the data will be handled only by the persons who are in charge and responsible for the related activities and by other persons working in the same areas as specified in internal communications; sensitive data will be handled only within those offices at SACI which are exclusively dedicated to SACI programs, for the purposes above specified, by persons officially appointed to this task. The personal data you have provided, with the exception of sensitive data, may be reported to your home school pursuant to the terms, conditions, and limits specified by Title VII of Legislative Decree n. 196/2003.
7. In particular your data may be communicated, in compliance with the rules above indicated, to public or private entities to whom doing so is necessary in order to fulfill obligations set forth by Italian or European laws or regulations. Sensitive data may be communicated to public bodies and authorities (such as USL or public hospitals, public safety authorities, police offices, courts,

magistrates, and the like) and to private subjects (such as private hospitals and clinics, security supervisors, insurance companies) only for the purposes of guaranteeing and preserving your health and safety and for the purposes of fulfilling obligations set forth by Italian or European laws and regulations

8. The Data Controller, under the law and with particular reference to the safety obligations related to the automatic processing of your data, is SACI.
9. The data provided will be processed by SACI in its capacity as Data Processor with the supervision of Ms. Elizabeth Johnson, Data Manager in compliance with art. 7 of Legislative Decree 196/2003, whom you can reach at Tel 055-289948. E-mail: registrar@saci-florence.edu.
10. You will be able to exercise any and all other rights foreseen by Art. 7 of Legislative Decree n. 196/2003 reproduced hereunder in its entirety:
 - 1) You have the right to obtain confirmation of the existence or not of your personal data, even if not yet recorded, and their communication in intelligible form.
 - 2) You have the right to obtain information about:
 - a) the origin of the personal data;
 - b) the reasons and methods for its processing;
 - c) the reasons why it is possibly carried out with the aid of electronic equipment;
 - d) the name of the data controller, of those responsible and the appointed representative as per Art. 5 paragraph 2;
 - e) the organizations and categories of organizations to whom personal data can be communicated or who are likely to get to know them in their capacity of designated representative in any area of the country, of officers and appointees.
 - 3) You have the right to obtain:
 - a) any updates, corrections, or additions to the data;
 - b) the cancellation, transformation in anonymous form or the blockage of any data processed unlawfully, including those whose storage is not necessary in relation to the aims for which the data were collected or later processed;
 - c) a statement that the operations indicated in letters a) and b), including their content, have been made known to those to whom the data have been communicated or released, except when impossible or requiring the use of means which are clearly disproportionate to the protected right.
 - 4) You have the right to completely or partially oppose:
 - a) for legitimate reasons, the processing of personal data which regards you even if relevant to the aims of their collection;
 - b) the processing of your personal data for the purpose of sending publicity material, direct sales or for carrying out market research or commercial communications.

You can exercise your rights as per Art. 7 of Legislative Decree 196/2003, (updating, correction, integration, cancellation, transformation, anonymously or blockage of data processed illegally, opposition, request for information as per section 1 and as per letters a), b), c), d) and 2) 2nd section, by contacting SACI, Via Sant'Antonino 11, 50123 Firenze, - or by sending an e-mail to the following address: registrar@saci-florence.edu.

Updated: 09/2017