



**PRIVACY POLICY - I.M.S.E.A**  
**Information pursuant to Article 13 of the EU Regulation 2016/679 ("GDPR").**

**1) DATA CONTROLLER**

Fondazione Istituto Tecnico superiore per la mobilità sostenibile – Settore trasporti/marittimi e pesca – ACCADEMIA ITALIANA DELLA MARINA MERCANTILE, current in Genova (Italy), Via Oderico 10, C.F. 01597860996 PEC [direzione-faimm@pec.it](mailto:direzione-faimm@pec.it)

**2) CATEGORIES OF PERSONAL DATA PROCESSED**

With the submission of the application and subsequent admission to the training course in question, the following categories will be processed:

- a) personal data, landline and/or mobile phone numbers, e-mail address;
- b) educational qualifications, professional career and employment status;
- c) communications between the Data Subject and the Data Controller, written and oral;
- d) photographic images

**3) PURPOSE, LEGAL BASIS AND RETENTION PERIOD OF DATA PROCESSING**

PURPOSE	LEGAL BASIS	RETENTION PERIOD
Selection of applications and admission to the course	Execution of pre-contractual measures stipulated with the data subject (application form)	For 5 years from the deadline of enrolment
Establishment, management and termination of the educational service to the Data Subject, including, for applicants, access to scholarships provided by IMO as well as the hospitality service.	Execution of a contract entered into with the Data Subject	For 5 years after the termination of the training service
Publication of the activities carried out by the Data Controller on the website, social networks or other computer platforms or physical modes, limited to photographic images.	Optional consent given by the Data Subject	Until the exercise of its right to unsubscribe
Transmission of communications pertaining to initiatives or information regarding the Data Controller (e.g., newsletters, flyers etc.)	Optional consent given by the Data Subject	Until the exercise of its right to unsubscribe
Regulatory, administrative and accounting obligations imposed by the legislation Fulfillment of a legal obligation	Fulfilling a legal obligation	Timing foreseen by the legal provisions on administrative and accounting matters
Tutela dei diritti e delle proprietà del Titolare, anche in sede giudiziale	Protection of the rights and property of the Data Controller, including in judicial proceedings	For the entire duration of the judicial proceedings undertaken and any timelines provided for the protection of the rights of the Data Controller

After these terms, the data will be destroyed and/or anonymized in accordance with the above timelines and, if applicable, used exclusively for statistical and analytical purposes.

**4) CATEGORIES OF SUBJECTS TO WHOM THE DATA COULD BE COMMUNICATED**



The data will be processed exclusively by employees or collaborators of the Controller duly appointed, trained, instructed and bound to the processing exclusively for the purposes for which the data were collected.

In addition, data may be communicated by the Controller to the following categories of subjects:

- to subjects entitled to access the data by virtue of a provision of law, regulation or EU legislation, or on the basis of an order of the Judicial Authority, within the limits provided for by such rules or orders;
- to service companies to which we entrust, also in outsourcing, the technological management of the data, or that offer IT assistance, management and consulting services as well as design and implementation of software and/or Internet sites, as well as companies or consultants in charge of providing specific services to the Data Controller (such as, for example, law firms and tax consultants), always within the limits of the purposes for which the data were collected;-
- third party companies possibly in charge of the management of the services of accounting, invoicing and management of payments of amounts due or by third party contractors in relationships closely related to the services described above;
- IMO for the possible management and disbursement of the scholarships provided in relation to the training service offered.

In such cases, the above mentioned parties will operate as autonomous Data Controllers or will be designated as Data Processors and to them the Data Controller will issue appropriate operational instructions. The updated list of external Data Processors is kept at the Controller's office. Personal data will not be subject to dissemination.

The data may be transferred abroad in the manner provided for in Article 49 of the GDPR.

## 5) DATA SUBJECT RIGHTS

The privacy legislation (Articles 15-23 EU Reg. 2016/679) guarantees the Data Subject the right to:

- obtain information on the origin of the data, the purposes and methods of processing, the logic applied in the case of processing carried out with the aid of electronic instruments; the details of the Data Processors, the subjects or categories of subjects to whom the data may be communicated or who may become aware of it- obtain access, updating, rectification or integration of data, the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those that do not need to be kept for the purposes for which the data were collected or subsequently processed, certification that the operations requested have been brought to the attention, also with regard to their content, of those to whom the data were communicated, except where this proves impossible or involves a manifestly disproportionate to the protected right;
- oppose, for legitimate reasons, the processing of data concerning him/her, even if pertinent to the purpose of collection, or the processing of personal data concerning him/her for the purpose of sending commercial and promotional communications, including in part with regard to the possible use of automated means of contact or profiling
- object on legitimate grounds to the processing of data concerning him/her, even if pertinent to the purpose of collection, or to the processing of personal data concerning him/her for the purpose of sending commercial and promotional communications, including in part with regard to the possible use of automated contact methods or profiling
- receive in a structured, commonly used and machine-readable format personal data transmit such data to another Data Controller.

Acknowledgement may take up to 30 days from the date the request is sent.

Without prejudice to any other administrative or jurisdictional recourse, The Data Subject has the right to lodge a complaint with the Supervisory Authority for cases of deemed violation by the Company of the provisions of EU Regulation 2016/679.

The Data Controller has appointed a Data Protection Officer (DPO).

To exercise your rights and/or for all matters related to the processing of your data, the Contractor may contact address a communication to - Via Oderico 10, 16146 - Genoa, Italy; or to [privacy@faimm.it](mailto:privacy@faimm.it)

## CONSENT TO THE PROCESSING OF PERSONAL DATA

Aware that with the submission of the application for participation in the course and subsequent selection phase as well as with the acceptance of the "Training Pact" you accept the related data processing activities, read and understood the privacy policy, in particular:

- with reference to the processing of photographic images portraying the interested party during participation in the course for the purposes of publicizing the activities carried out by the Owner on the website, social networks or other computer platforms or physical means, without prejudice to the possibility of limiting/withdrawing the consent given at any time.

I GIVE MY CONSENT

I DENY MY CONSENT



- with reference to the processing of contact data for the purpose of transmission of communications pertaining to initiatives or information regarding the Data Controller (e.g. Newsletter, flyers, etc.).

I GIVE MY CONSENT

I DENY MY CONSENT

Date \_\_\_\_\_ Signature \_\_\_\_\_