

Privacy policy

Introduction

For the eastwest European Institute your privacy and the safety of your personal data are particularly important, and that's why we collect and process them with the utmost care and attention, adopting both specific technical and structural precautions to ensure their complete safety.

Pursuant to art. 13 of European Regulation 2016/679 ("Regulation") the processing of your personal data is performed using appropriate methods to ensure their safety and confidentiality. The process involves the use of hard copy, computer and/or electronic supports, as detailed in this privacy notice.

This notice is also provided pursuant to Recommendation no. 2/2001 that the European authorities for the protection of personal data, all part of the Group set up by art. 29 of directive 95/46/EC, adopted on 17 May 2001.

Definitions

Personal data: we here refer to any information concerning an identified or identifiable natural person ("data subject"). A natural person is considered identifiable if they can be directly or indirectly identified through a specific identification reference such as a name, an identification number, data relative to location, an online identification or one or more specific elements of his or her physical, physiological, genetic, psychic, economic, cultural or social make up.

Processing: we here refer to any operation or set of operations, performed with or without the aid of automated processes and applied to personal data or sets of personal data, such as their collection, registration, organisation, structuring, conservation, adaptation or modification, extraction, consultation, use, communication through transmission, dissemination or any other method by which they may be made available, as well as their comparison or interconnection, limitation, cancellation or destruction.

Special categories of personal data: this is data that reveals racial or ethnic origin, political opinions, religious or philosophic beliefs or trade union membership. It also refers to the processing of genetic data, biometric data used to identify a specific natural person, data on health or a person's sex life or sexual orientation.

The Data Controller: is the natural or legal entity, public authority, service or other organism which, either individually or along with others, decides the purpose and the methods used to



eastwest
European
Institute

www.ew-ei.eu

segreteria.corso@ew-ei.eu • 06 99330213 • via Piemonte 39 - Roma



IN PARTNERSHIP WITH

process personal data.

Data Processor: is the natural person or the legal entity, public authority, service or other organism that processes personal data on behalf of the Data Controller.

Data Controller

The processing of your personal data is carried out by eastwest European Institute srl, with offices in Rome (Italy), Via Piemonte 39, CAP 00187, as Data Controller pursuant and for the effects of the EU Regulation.

Any questions or requests you may have linked to the processing of your personal data please contact eastwest European Institute at any time by sending a communication to the following addresses:

Eastwest european institute srl

Privacy manager: Giuseppe Scognamiglio

Company name: eastwest European Institute

Legal office address: in Rome (Italy), Via Piemonte 39, CAP 00187

Telephone and fax contact data: tel. 06-81157586

Email contact data: info@ew-ei.eu

Type of data

The personal data that eastwest European Institute processes are those you provide when you complete a purchase order for goods or services or those we collect while you browse or use the online services offered by eastwest European Institute.

eastwest European Institute may therefore collect your data such as for example your name and surname, email, shipping and invoicing address, browsing data and data on your purchase choices.

When browsing the site, eastwest European Institute may therefore acquire information on the visit, in the following ways:

Browsing data

The computer systems and software procedures used to operate this website, during their normal operation, acquire a few personal details the transmission of which is implicit in the use of Internet communication protocols. The data that is included in this category are: IP addresses, the type of browser used, the operating system, the name of the domain and the addresses of the websites from which access was achieved, information on the pages visited by the users of the site, the time of access, how long you spent on each page, the



analysis of the internal path and other parameters related to the user's operating system and computer environment.

Further data categories

This is all the personal data supplied by the visitor via the website. These are provided when you register and/or access a reserved area and/or a service and/or take part in one of the initiatives launched by eastwest European Institute of its own accord or in partnership with third parties or when you write to an eastwest European Institute e-mail address to receive information or by calling in.

Cookies

Cookies are files which may be stored on your computer's hard disk. This enables you to enjoy a more efficient and user-friendly browsing experience on our site. For more information and to access a detailed notice, please consult our Cookie Policy.

Purpose of data processing

Your personal data, once collected, is processed for the following purposes:

- technical and administrative management of the purchase of Courses, Seminars, events even in e-learning mode
- management of compulsory contractual, accounting or tax relations set up between you and eastwest European Institute, the owner of the Internet site.
- computer and/or telephone communications concerning organisational or management aspects of the Course
- communication of your personal identification data and other necessary information required for the management and organisation of the courses to Course lecturers and tutors

The legal basis of all the processing detailed above is provided by Art. 6, paragraph 1 lett. A-B-C-F of the Reg. 679/16 (GDPR).

We inform you that your personal data will not be transmitted to countries outside the EU but may also become known to other subjects or general categories of subjects, appointed as external data processes pursuant to art. 28 GDPR, other than the Controller, such as:

- IT companies: for management, maintenance purposes and updating of the systems and software used by the Controller;



- Suppliers of networks, electronic communication services and computer or electronic filing, conservation and computer data management services: for hosting, housing, cloud, SaaS and other remote computer services that are essential in order for the Controller to be able to perform its activities;
- Consultants, professionals, legal firms, arbitrators, insurances, adjusters, brokers: to manage tax and administrative aspects of the contractual relationship. For judicial, out of court, insurance activities and in the event of accidents.

Your data may also be transmitted to the forces of law and order and the judicial and administrative authorities, in compliance with the law, to verify and pursue crimes, prevent and safeguard against threats to public safety, as well as to enable eastwest European Institute to exercise or protect a right of its own or of third parties in front of the competent authorities, as well as for other reasons connected to the protection of the rights and freedoms of others.

Data Retention

We inform you that your data will be kept on file for a limited time, which varies depending on the type of processing and the specific purposes of the same, as exemplified below:

- data collected to complete or execute contracts involving the purchase of goods or services: the data will be kept on file until all administrative and accounting formalities have been completed. The data linked to invoicing will be kept for ten years of the data of invoice;
 - the data of a user registered on a portal/website: the data shall be kept on file until you request your profile be cancelled;
 - payment data: the data shall be kept until receipt of payment has been received and once all administrative and accounting formalities have been completed;
 - data collected while taking advantage of the services provided by eastwest European Institute: this data shall be kept on file until the service is shut down or the user cancels their subscription to the service;
 - CV: for six months of the date of receipt;
- At the end of said periods, your data will be cancelled for good or in any case rendered irreversibly anonymous by eastwest European Institute.



Your rights

We inform you that you have the right to exercise the following rights on the personal data that is the object of this notice, as foreseen and guaranteed by the Regulation: Rights of access and rectification (articles 15 and 16 of the Regulation): you have the right to access your personal data and ask that they be corrected, modified or integrated. If you wish, we will provide you with a copy of all data that concerns you in our possession.

Right of data cancellation (Art. 17 of the Regulation): in the instances foreseen by the current regulations you may request the cancellation of your personal data. Once your request has been received and assessed, if deemed legitimate, we will take the necessary steps to terminate the processing and cancel your personal data.

Right to restrict processing (Art. 18 of the Regulation): you have the right to request that the processing of your personal data be restricted in the event of illicit processing or if the data subject disputes the correctness of said personal data.

Right to data portability (Art. 20 of the Regulation): you have the right to obtain your personal data from the Data Controller in order to forward them to another Controller, in the instances detailed by the article.

The right to opposition (Art. 21 of the Regulation): you have the right to oppose the processing of your personal data at any time based on a legitimate claim, explaining the reasons that justify such a request: before complying with the request, [...] shall evaluate the reasons for your request.

Right to file a complaint (Art. 77 of the Regulation): you have the right to file a complaint before the competent Guarantor Authority for the protection of Personal Data if you believe that it is a violation of your rights with regard to the processing of your personal data has been perpetrated or is being perpetrated.

You may exercise your rights at any time with specific reference to the processing of your personal data by eastwest European Institute.

Further information regarding the rights of the data subject may be obtained by asking the Controller for a complete extract of the articles referred to above.

Security measures

We undertake to protect your personal data with specific technological and organisational safety measures, designed to prevent your personal data being used in any illegitimate or fraudulent way. We take steps to regularly test, verify and assess the effectiveness of the safety measures, in order to guarantee the constant improvement of our processing security.



Changes to this privacy notice

The constant evolution of our services, may entail changes in the characteristics of the processing applied to your personal data as described so far. This privacy notice may be subject to modifications and integrations over time, as are deemed necessary as a result of new regulations for protection of your personal data, or owing to developments/changes to our services.

We therefore invite you to verify the content of this privacy notice on a regular basis: if possible, we will try to inform you with the utmost promptness of any changes made and their possible repercussions.



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