



PRIVACY STATEMENT FOR PROCESSING OF PERSONAL DATA

EUI Crèche enrolment and management

(last updated on 03.06.2020)

1. Description of the processing operation

The processing operation is used to collect the personal data of the parents/holders of parental responsibility and of the child(ren) enrolled in the EUI crèche, a childcare facility offered for members of the EUI community whose children are between 4 months and 3 years old (exceptionally, older children can also be admitted to the crèche).

In order to enrol your child(ren), you shall complete a registration form, available on the EUI intranet:

<http://www.eui.eu/Documents/ServicesAdmin/Logistics/Creche/RegistrationForm.pdf>

The form is necessary for admission of children to the crèche. A list of all children enrolled in the crèche is derived from the registration forms received. The list with the names of children and of their parents/guardians in charge of paying the crèche contribution to the EUI (along with their status, administrative or academic unit, date of leave) is then sent to the attention of a member of the Budget and Financial Affairs Service to calculate the fees, related to the number of attendances made. The form is also useful to know who are the persons authorized to collect the child. A telephone number to be used in case of emergency is also included.

The registration form must be accompanied by a medical certificate, attesting the health of the child(ren), and a copy of the vaccination certificate. You will also be asked to provide a list of food intolerances or allergies of your child(ren). The information included in the registration form and medical certificates may also be used in case of emergency.

You will also be asked to complete an additional form specifying whether or not you authorize crèche teachers to take pictures of your child(ren) during the period of attendance for purely educational purposes and to be used only within the crèche premises. Teachers take pictures of the children using business phones and delete them after having sent them to the parents/holders of parental responsibility.

The Data Controller, overall responsible for the processing of personal data, is the Director of the EUI Real Estate and Facilities Service (REFS). Personal data are processed

by the staff member of the REFS in charge of the EUI Crèche secretariat (currently, Mrs Gloria Peruzzi).

2. What personal data do we collect, for what purpose, and through which technical means?

Type of personal data

Child's personal data

- Child's surname and name, date of birth, nationality, pictures taken during period of enrolment at the Crèche (the latter type of data only if covered by parents'/holders of parental responsibility' explicit consent).

Child's medical data (sensitive data):

- certificate attesting that the child's fitness and health, copy of the vaccination certificate, list of food intolerances or allergies; in case of absence for illness (for more than 5 consecutive days), a doctor's certificate attesting that as from (date) the child can return to the Crèche is requested for re-admittance (without details about the sickness).

Parents' personal data

- Parent(s)' /holders of parental responsibility' surname and name, their status at the EUI and the corresponding EUI Department/Service, their address in Florence, telephone and mobile phone numbers (telephone number in case of emergency if different), e-mail address, details of the monthly net income and number of children enrolled at the crèche.

N.B. during periods of health emergencies, such as the Covid-19, other types of personal data may be requested in order to comply with the regulations adopted by Italian authorities (eg. DPCM 17/05/2020 and relative Ordinanza 61 Regione Toscana). In the case of the Covid-19 emergency personal data is processed according to the [Notification Form](#) and the [Privacy Statement](#) for the Management of the preventive controls at EUI Complexes entrances.

Purpose

The main purpose of the processing is to admit children to the EUI crèche, to keep detailed and updated data concerning the number of children enrolled in the crèche and to calculate each month the fees that parents/holders of parental responsibility of children enrolled at the EUI crèche have to pay; the purpose is also to have all the necessary details

at hand in case of emergency and to authorize the taking of photos of the children (in the crèche).

Technical means

Personal data is processed through manual and electronic processing.

Manual processing: maintaining paper files.

Electronic processing: conversion of paper files/registration forms into scanned copies (pdf files) and maintaining pdf files on a computer.

3. Who collects and has access to your personal data and to whom is it disclosed?

The member of the REFS in charge of the Crèche secretariat (currently, Ms. Gloria Peruzzi) collects personal data. Only the person in charge of the Crèche secretariat has access to the original data (stored electronically and in hardcopy).

In specific circumstances, such as in the case of health emergencies (eg. Covid-19 emergency), a selected number of staff (REFS members) can be authorised to access the data.

A monthly list of attendances of every child is sent to the Budget and Financial Affairs Service. The Budget and Financial Affairs Service then performs the calculation and deduction of the crèche from parents'/holders of parental responsibility' salaries or grants.

A list containing the parents'/holders of parental responsibility' mobile phone numbers is circulated to the crèche teachers for information.

With your agreement, transfer of children's medical data to the Crèche paediatrician might take place. Particular health conditions, indicated in the registration form, are duly communicated to the Crèche teachers, where needed.

4. How do we protect and safeguard your information?

All personal data collected are internally processed only by designated EUI staff members or agents, and stored on servers, which abide by the EUI security rules and standards.

Only the member of the REFS responsible for the Crèche secretariat has access to the stored documentation. Electronic files can be accessed only upon IT user authentication

(user ID and password). Hardcopy documentation is stored in cupboards and storage offices are always locked when unattended.

In specific circumstances, such as health emergency situations (eg. Covid-19 emergency) a selected number of staff (REFS members) can be authorised to access the data.

In the case of a personal data breach, the data subject will be informed without undue delay (article 14 of the President Decision n. 10/2019 of 18 February 2019).

A Declaration of confidentiality and protection of personal data is signed staff members.

5. How long do we keep your data?

Personal data is kept as long as necessary, i.e. until the child is enrolled at the Crèche and for one year after he leaves the Crèche. In the case of administrative data, that time limit is needed firstly to calculate contributions and any reimbursements.

Pictures of the children are deleted after having been sent to the parents/holders of parental responsibility.

Financial data (re the deduction of Crèche fees from your salary/grant) is kept at least five years after the budgetary discharge, but personal data contained in supporting documents is deleted where possible when those data are not necessary for budgetary discharge, control and audit purposes.

6. How can you verify, modify or delete your personal data?

If you wish to verify which personal data is stored by the responsible Data Controller, or access, correct, or delete your personal data, please contact the Data Controller of the REFS at DataControllerREFS@EUI.eu. You will receive a reply within 30 days of receipt of the request.

For more information about the EUI data protection policy, please visit <http://www.eui.eu/AboutTheWebsite/DataProtection.aspx>.

<https://www.eui.eu/About/DataProtection>

7. Recourse

You have the right to have recourse to the Data Controller of the REFS DataControllerREFS@EUI.eu with simultaneous notification to the EUI Data Protection Officer at EUI, Data Protection Officer at Data_Protection_Officer@EUI.eu if you consider that your rights under the EUI President's Decision 10/2019 of 18 February 2019 regarding Data Protection at the EUI have been infringed as a result of the processing of your personal data by the EUI.
