Privacy notice pursuant to art. 13 EU Regulation no. 2016/679 (GDPR)

Data Controller
The Data Controller is COMSEV, Cooperativa Mensa della Scuola Europea di Varese, located at Via Montello 118 in Varese, Fiscal Code 02963820127.

Purpose and Methods of Data Processing
COMSEV will process the personal data you provide, as identified in Article 4 of the GDPR, such as name, surname, address, telephone number, email, bank and payment details, hereinafter referred to as personal data and attributable to the user of the service and their family. In addition, special data as identified by Article 9 of the GDPR may be processed, such as data relating to health, ethnic origin, religious or philosophical beliefs. Processing includes the use of telephone numbers and email addresses for service communications and payment management. To process and store data, in both paper and digital format, suitable tools will be used to guarantee its protection, confidentiality, and integrity, in compliance with the regulations.

Purpose of Processing
 The processing is necessary to provide the services you request, to allow each user to benefit from personalized services such as special diets, and to enable COMSEV to fulfill the obligations required by current legislation and necessary for economic and organizational management.

Legal Basis
COMSEV processes data pursuant to Article 6, letter a of the GDPR based on your consent and pursuant to Article 6, letter b, and e GDPR for the following purposes: a) to fulfill pre-contractual, contractual, and tax obligations; b) to fulfill obligations required by law, by a regulation, by EU legislation, or by an order of the Authority; c) to exercise the rights of the Data Controller.

Data Retention and Destruction Times
The data will be processed only for the time necessary to fulfill the purposes described and stored securely for 10 years after the member's withdrawal. After this period, paper data will be destroyed using a shredder and digital data will be deleted.

Validity of Consent
The documentation relating to consent to the processing of data will be kept and considered valid indefinitely in relation to the main purposes indicated, unless you communicate otherwise, and we reserve the right to request consent to the processing of data again.

Data Access
Those who work for the Data Controller as employees and collaborators (in various capacities), following a specific assignment and training, will have access to the data. External Data Processors appointed for the execution of specific processing operations will have access as External Data Processors. The list of external data processors is available at our headquarters.

Data Communication
Pursuant to Article 6, letters b, c of the GDPR, the Data Controller may communicate the data to the subjects to whom communication is required by law for the performance of management, accounting, compliance with regulations, and to the appointed external data processors. The data will not be disseminated. In particular, COMSEV may share some data, to the extent strictly necessary for the provision of services, with the European School of Varese, with which it has a contract in place for the provision of spaces and tools that includes a mutual commitment to confidentiality.

Data Transfer
Personal data is stored within the European Union.

Rights of the Data Subject
Each data subject can exercise the rights pursuant to Article 15 of the GDPR:
i. obtain confirmation of the existence or non-existence of personal data concerning you, even if not yet registered, and their communication in an intelligible form; ii. obtain the indication: a) of the origin of the personal data; b) of the purposes and methods of processing; c) of the logic applied in case of processing carried out with the aid of electronic instruments; d) of the identification details of the data controller, of the data processors and of the designated representative pursuant to Article 5, paragraph 2 of the Privacy Code and Article 3, paragraph 1, GDPR; e) of the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it as designated representative in the State territory, of data processors or persons in charge; iii. obtain: a) the updating, rectification or, when interested, the integration of data; b) the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including data whose retention is not necessary for the purposes for which the data were collected or subsequently processed; c) the certification that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case where such fulfillment proves impossible or involves a use of means manifestly disproportionate to the right protected; iv. oppose, in whole or in part: a) for legitimate reasons, to the processing of personal data concerning you, even if pertinent to the purpose of the collection; b) to the processing of personal data concerning you for the purpose of sending advertising material or direct sales or for carrying out market research or commercial communication. Where applicable, you also have the rights pursuant to Articles 16-21 of the GDPR (right of rectification, right to be forgotten, right to restriction of processing, right to data portability, right to object), as well as the right to lodge a complaint with the Supervisory Authority.

How to Exercise Your Rights
You can exercise your rights at any time by contacting the Data Controller in a free form or the Data Protection Officer at the address dpo@mbsafety.it.