



STIT-VET

Privacy Policy

AFORISMA Srl, with registered office at Via dei Cappuccini 4 - 56121 - Pisa (PI), VAT number 01535630501 (hereinafter referred to as "**Aforisma**" or the "**Data Controller**"), constantly strives to protect the privacy of those who intend to participate (hereinafter referred to as the "**Data Subject**") in the project called "*Smart Tools for Inclusive Teaching in VET*" (hereinafter referred to as the "**Project**")

Personal data of the Data Subject are collected, in the name and on behalf of the Data Controller, at:

- QZR srl, with registered office in Via della Chiesa XXXII trav. I n. 231 loc, 55100 Sorbano del Vescovo - Lucca (LU), VAT number IT02327660466;

- FLIPNET - Associazione per la promozione della didattica capovolta, with registered office in Via delle Montagne Rocciose, 31 00144 Roma (RM), VAT number: IT12895341001;

- Bexley C-Level IT, with registered office in Str. Strajerului 26, Constanta, 900923, Romania;

- Fundación Docete Omnes, with registered office in Calle Padre Villoslada, 2, 18140 La Zubia, Granada, Spain;

(hereinafter, the "**Partners**"), which - in turn - are autonomous Data Controllers of the aforesaid data, where they process them for their own purposes and other than the implementation of the Project.

This document has been drawn up pursuant to Article 13 of the EU Regulation 2016/679 (hereinafter: "**Regulation**") in order to allow you to get to know our privacy policy, to understand how your personal information is handled when you use our sites (<https://videocourse.stitedu.eu/>, hereinafter collectively "**Site**") and, where applicable, to give your express and informed consent to the processing of your personal data

The information and data provided by you or otherwise acquired in the context of the use Project's services, e.g.: registration to the reserved area of the Site (hereinafter "**Services**"), will be processed in compliance with the provisions of the Regulations and the confidentiality obligations that inspire the activity of Aforisma.

According to the rules of the Regulation, the processing carried out by Aforisma will be based on the principles of lawfulness, fairness, transparency, purpose limitation and conservation, data minimisation, accuracy, integrity and confidentiality.

1. Data Controller and Data Protection Officer

The Data Controller of the processing carried out through the Site is Aforisma as defined above. For any information concerning the processing of personal data by Aforisma, including the list of data processors who process data, you may write to the following address: info@aforismatoscana.net.

2. The personal data being processed





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Following your registration on the Site, we inform you that Aforisma will process personal data, which may consist of an identifier such as your name, an email address, an identification number, an online identifier (hereinafter only "**Personal Data**").

Your Personal Data may be collected because you voluntarily provide it (e.g. when you register on the Site) or simply by analysing your behaviour on the Site. The Personal Data processed through the Site are as follows:

a. Navigation data

The computer systems and software procedures used to operate the Site acquire, during their normal operation, some Personal Data whose transmission is implicit in the use of Internet communication protocols. This information is not collected in order to be associated with identified interested parties, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes the IP addresses or domain names of the computers used by users who connect to the Site, the URI (Uniform Resource Identifier) notation addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and IT environment. This data is used for the sole purpose of obtaining anonymous statistical information on the use of the Site and to check its correct functioning, to identify anomalies and/or abuses. The data could be used to ascertain responsibility in the event of hypothetical computer crimes to the detriment of the Site or third parties: except for this possibility, at present the data on web contacts do not persist for more than 365 days.

b. Data provided voluntarily by you

Without prejudice to the reference to specific information contained herein, this Privacy Policy also applies to the processing of the data you voluntarily enter in the various forms contained in the Site. With reference to the latter, we invite you not to enter information that may fall within the category of special categories of personal data referred to in art. 9 of the Regulation ([...]personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data intended to uniquely identify a natural person, data concerning health or sex life or sexual orientation of the person). Furthermore, if you decide to leave a review of products on sale on the Site, please do not enter any Personal Data in the form or nickname you choose to leave the review.

c. Data processed in interaction with social networks

In addition to filling in the forms on the Site, you may request certain services and provide your Personal Data through your Facebook profile, Google, and other social networks, for example, for the purpose of registering on the Site. In these cases, Facebook, Google and





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any social networks involved will automatically send your Personal Data to Aforisma without you having to enter it.

d. Cookies

Definitions, characteristics and enforcement

Cookies are small text files that sites you visit send and store on your computer or mobile device, to be transmitted back to the same sites the next time you visit. It is precisely thanks to cookies that a site remembers the user's actions and preferences (such as, for example, login data, chosen language, font size, other display settings, etc.) so that they do not have to be indicated again when the user returns to that site or navigates from one page to another of it. Cookies, therefore, are used to perform computer authentication, session monitoring and storage of information concerning the activities of users accessing a site, and may also contain a unique identification code that makes it possible to keep track of the user's navigation within the site for statistical or advertising purposes. While browsing a site, the user may also receive on his/her computer cookies from sites or web servers other than the one he/she is visiting ("third party" cookies). Certain operations could not be carried out without the use of cookies, which in certain cases are therefore technically necessary for the operation of the site itself.

There are various types of cookies, depending on their characteristics and functions, and these may remain on the user's computer for different periods of time: so-called session cookies, which are automatically deleted when the browser is closed; so-called persistent cookies, which remain on the user's equipment until a predetermined expiry date.

Under current Italian law, the use of cookies does not always require the express consent of the user. In particular, "technical cookies", i.e. those used for the sole purpose of carrying out the transmission of a communication over an electronic communication network, or to the extent strictly necessary to provide a service explicitly requested by the user, do not require such consent. In other words, these are cookies that are indispensable for the operation of the site or necessary to perform activities requested by the user.

Among technical cookies, which do not require express consent for their use, the Italian Data Protection Authority (cf. Simplified Arrangements to Provide Information and Obtain Consent Regarding Cookies of 8 May 2014 and subsequent clarifications, hereinafter only '**Arrangements**') also includes:

- analytics cookies' where used directly by the site operator to collect information, in aggregate form, on the number of users and how they visit the site,
- navigation or session cookies (for authentication),





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- functionality cookies, which allow the user to navigate according to a set of selected criteria (e.g. language, products selected for purchase) in order to improve the service rendered to the user.

For 'profiling cookies', on the other hand, i.e. those aimed at creating profiles of the user and used for the purpose of sending advertising messages in line with the preferences expressed by the user when surfing the web, prior consent of the user is required.

Types of cookies used by the Site and the possibility of (de-)selection

The Site uses the following cookies that can be de-selected, except for third-party cookies for which you will have to refer directly to the relevant cookie selection and de-selection methods, indicated by means of links:

- Navigation or session technical cookies and strictly necessary for the operation of the Site or to enable you to take advantage of the content and services requested.
- Functionality cookies, i.e. used to activate specific functionalities of the Site and a set of selected criteria (e.g. language) in order to improve the service rendered.
- Technical-analytics cookies, which allow us to understand how the Site is used by users. These cookies do not collect information about your identity or any personal data. The information is processed in aggregate and anonymous form.

WARNING: by disabling technical and/or functionality cookies, the Site may be unavailable or certain services or functions of the Site may not function properly and you may be forced to change or manually enter certain information or preferences each time you visit the Site.

3. Purpose of processing

The processing we intend to carry out, with your specific consent where necessary, has the following purposes:

- allow browsing of the Site and the provision of Services requested by you from time to time to Aforisma, such as, for example: registration and access to the private area of the Site; execution of purchase orders, delivery of products; performance of activities related to the provision of products and services; publishing reviews transmitted through the Site, responding to and satisfying requests for assistance or information (including pre- and post-sales customer care services), sending you the Controller's newsletter if requested by you through the section of the Site Subscribe to newsletter;





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- b.** to fulfil any obligations under applicable laws, regulations or EU legislation, or to comply with requests from the authorities;
- c.** carry out direct marketing by e-mail for services similar to those purchased or requested by you, unless you expressly refuse to receive such communications, which you may do at registration or on subsequent occasions;
- d.** carry out marketing activities, such as processing statistics and market research, sending you other information and promotional material relating to the activities, products and services of Aforisma, surveys to improve the service ("customer satisfaction"), requesting reviews of products purchased. These communications may be made by e-mail, by sms, push notifications, through paper mail and/or the use of the telephone with operator; it is specified that the Data Controller collects only one consent for the marketing purposes described herein, pursuant to the General Measure of the Guarantor for the Protection of Personal Data "[Guidelines on promotional activities and fight against spam](#)", of July 4, 2013; if, in any event, you wish to object to the processing of your data for marketing purposes carried out by the means indicated herein, you may do so at any time by contacting the Data Controller at the contact details indicated in the "Contact Us" section of this information notice, without prejudice to the lawfulness of the processing based on the consent given prior to revocation;
- e.** to analyse your interests, habits and consumption choices, in order to be able to send you personalised information and promotional material on the services and products offered by Aforisma ("profiling"), to create a profile through the use of profiling cookies, where accepted, thus collecting and analysing information on your preferences and choices expressed on the Site;
- f.** for purposes of preventing fraud committed through the use of the Site and the services offered by the Controller and to enable the Controller to protect itself in court;
- g.** for statistical purposes, without it being possible to trace your identity.

4. Recipients of personal data

Your Personal Data may be shared, for the purposes set out in section 3 above, with:

- a.** parties that typically act as data processors, namely: i) persons, companies or professional firms that provide assistance and consultancy to Aforisma in accounting, administrative, legal, tax, financial and debt collection matters in relation to the provision of Services; ii) subjects with whom it is necessary to interact for the provision of Services (e.g. hosting providers) iii) or subjects delegated to carry out technical maintenance activities (including maintenance of network equipment and electronic communication networks); iv) subjects delegated to organise and carry out the shipping, delivery and return of products purchased on the Site (collectively "**Recipients**");





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b. parties, entities or authorities to whom it is mandatory to communicate your Personal Data under provisions of the law or orders of the authorities or to whom it is mandatory to communicate your Personal Data in order to prevent and/or detect any fraudulent activity or abuse in the use of the Site and the services offered by the Controller;

c. persons authorised by Aforisma to process Personal Data necessary to perform activities strictly related to the provision of the Services, who have committed themselves to confidentiality or have an appropriate legal obligation of confidentiality (e.g. employees of Aforisma);

5. Data retention

Personal Data processed for the purposes set out in section 3 will be kept for the time strictly necessary to achieve those same purposes. In any case, since the processing is carried out for the provision of Services, Aforisma will process Personal Data for the time permitted by Italian law to protect its interests (Art. 2946 et seq. of the Civil Code).

6. Rights of the persons concerned

Pursuant to Articles 15 et seq. of the Regulation, you have the right to ask Aforisma, at any time, for access to your Personal Data, its rectification or deletion or to object to its processing, you have the right to request the restriction of processing in the cases provided for by Article 18 of the Regulation, as well as to obtain in a structured, commonly used and machine-readable format the data concerning you, in the cases provided for by Article 20 of the Regulation.

Requests should be made in writing to the addresses indicated in the 'Contact' section of this notice.

In any case, you always have the right to lodge a complaint with the competent Supervisory Authority, pursuant to Article 77 of the Regulation, if you consider that the processing of your Personal Data is contrary to the legislation in force.

7. Changes

The Owner reserves the right to modify or simply update the content, in part or in full, also due to changes in the applicable legislation. Aforisma will inform you of such changes as soon as they are introduced and they will be binding as soon as they are published on the Website. Aforisma therefore invites you to regularly visit this section to become aware of the most recent and updated version of the Privacy Policy in order to be always up to date on the data collected and the use made of it by the Data Controller.

8. Contact

To exercise the above rights or for any other request, please write to the Data Controller: Via dei Cappuccini 4 - 56121 - Pisa (PI) or by email to: info@aforismatoscana.net

