



Momo Education
by Sister Schools Foundation

PRIVACY POLICY

in accordance to D. Lgs.196/03

and Reg. (UE) 2016/679

1. Object and Place

The website <https://momoeducation.org>, created by MoMo Education by Sister Schools Foundation to promote a professional Learning Network Organisation to allow schools worldwide to work together on concrete community development projects, is managed by MoMo Education by Sister Schools Foundation, with registered office in Sarphatistraat 97-3, Amsterdam, The Netherlands.

The security and privacy measures applicable to this Site have been defined and developed to ensure that personal information is processed correctly in accordance with local and international regulations on security and privacy, in compliance with art. 5 of the General Data Protection Regulation (hereinafter the "GDPR"). Before communicating any personal data, we invite you to read this Privacy Policy carefully (hereinafter information or privacy policy), as it contains important information on the protection of personal data and on the security measures taken to guarantee its confidentiality in full compliance with the GDPR. This information illustrates the methods of processing the personal information of users (hereinafter "user", "users" or "you") by the Joint Controllers, pursuant to art. 13 of the GDPR and how to use, share, access, modify or delete personal information. As proof of their commitment to privacy, the Joint Controllers have defined this information in the broader context of a global privacy management model, in order to guarantee total respect for privacy as the foundation of the corporate culture of the Joint Controllers. All personal information provided by the user through this Site is used exclusively for the purposes described below. Furthermore, this information is intended only for the website <https://momoeducation.org> (hereinafter "Site") while it does not apply to other websites that may be consulted through external links.

Place of processing of data

The processing related to the site, takes place at the company headquarters in Sarphatistraat 97-3, Amsterdam, The Netherlands, of the Data Controller and are handled only by technical staff of the Office in charge of the processing, or by any persons in charge of occasional maintenance operations. No data deriving from the web service is communicated or disseminated (Art 90 GDPR).

Source and type of personal information

The Joint Controllers process different types of information about the user, collected from different sources, such as:

- information provided directly by the user;
- information obtained from automatic traceability systems when using the Site and related services.

More precisely, the Joint Controllers may process the following personal identification data of the user: a) Information provided voluntarily by the user for a contact request (by contacting the Foundation to the address on the Site). The Joint Controllers may also request the user to provide certain information in the event of reporting problems with their services on the Site;

b) Information relating to your use of the Site. For security purposes, the Joint Controllers process the navigation data (log files) relating to each session when the user logs in to his account, as well as payment information that will;

c) Navigation information. The computer systems of the Site collect some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with the user, but by its very nature could, through processing and association with data held by third parties, allow you to identify him. Among these are the IP addresses or domain names of the devices used to connect to the Site, the addresses in URI (Uniform Resource Identifier) notation of the requested resources, 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 related to the operating system and computer environment of the user. These data are used in order to obtain anonymous statistical information on the use of the Site and to check its correct functioning; to allow – given the architecture of the systems used – the correct provision of the various features requested by you, for security reasons and to ascertain responsibility in the event of hypothetical computer crimes against the Site or third parties and are deleted as soon as possible.

2. Purpose of the processing

3.1. The information collected by the Joint Controllers is used for the following purposes: o for the technical management of the Site and its operational functions, including the resolution of any technical problems, statistical analysis, testing and research; o in order to satisfy the user's requests (e.g., management of requests for information). The legal basis for the processing of Personal Data for the aforementioned purposes is the provision of a service or the response to a request that does not require consent under the GDPR (execution of a contract or the execution of pre-contractual measures).

3.2 Subscription to the Newsletter. The information collected by the Joint Controllers is used, with the prior consent of the users pursuant to art. 7 of the RGPD, for sending communications concerning the events organized by Joint Controllers (by e-mail). As already indicated above, the legal basis for the processing of Personal Data for the aforementioned purposes is consent. We remind you that your consent may be revoked by you at any time. Therefore, to stop receiving the Newsletter, write an email to info@sisterschools.

3. Processing methods

The processing of data is carried out, by means of the operations indicated in art. 4, point 2) of the GDPR, namely: collection, registration, organisation, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Users' data are processed with the help of computer and telematic means. The data will not be disseminated.

4. Categories of subjects who can access the data

Any personal information provided or collected by connecting to the Site will be processed by the Joint Controllers as Data Controllers. Personal information will be processed by the staff of the Joint Controllers responsible for processing the personal information collected: employees, consultants and volunteers authorised to manage the Site and provide the related services (e.g., management of Computer Systems and IT systems of the Joint Controllers, as persons in charge of processing and / or system administrators).

The Joint Controllers may also require their service providers to perform certain data processing operations on their behalf, according to the instructions provided by the Joint Controllers themselves and in line with this Privacy Policy. The aforementioned suppliers will process personal information as Data Processors on the basis of appropriate contractual commitments, and include, but are not limited to:

- a) suppliers of IT Systems and Site management services (e.g., hosting providers, providers of database management and maintenance services, website management and maintenance, companies for sending newsletters);
- b) companies or other professionals, whom we turn to for services of a professional nature.

5. Third parties to whom the information may be disclosed

Your information may also be disclosed to third parties for the following reasons: a. in order to fulfil the obligations established by laws, regulations, protocols and national or European legislation; b. in order to implement standards required by Public Authorities; c. in order to allow the defence in court of the Joint Controllers, for example in the case of violations by users of the network. The aforementioned parties will process the information as independent Data Controllers. The use of data by the aforementioned third parties will therefore not be governed by this Privacy Policy.

6. Transfer of data outside the EU

Personal data will not be transferred to Recipients outside the European Economic Area. In the event that they are in the future, the Joint Controllers ensure that the processing of Personal Data will take place in compliance with the GDPR. Indeed, the transfers will be based alternately on an adequacy decision or on the Standard Model Clauses approved by the European Commission. More information and a copy of these agreements will be available from the Joint Controllers, contacting them at the address indicated in point 14 of this statement.

7. Nature of the provision of personal information and consequences of refusal

The provision of information for contractual purposes as per point 3 is optional, but necessary for the execution of the service, a contract or the execution of pre-contractual measures adopted at the request of the user (e.g., request for information). In case of failure to provide it, the Joint Controllers will not be able to follow up the service and / or request.

The provision of information for the purpose of subscribing to the Newsletter (point 3.2) is voluntary and optional. Users can freely decide not to provide information for this purpose, as well as subsequently revoke their consent to the processing of information already provided: in this case users will not receive communications of events organized by the Joint Controllers as indicated in point 3.2.

8. Security

The Joint Controllers undertake to protect user information. All personal information you provide is stored on secure servers. The Joint Controllers use appropriate security measures to protect the information from unauthorised access or modification, and from the transmission or distribution of data. In order to prevent unauthorised access, maintain the accuracy of the data and ensure the correct use of the information, the Joint Controllers use appropriate material, electronic and managerial procedures to safeguard and protect the information and data stored in their system.

Disclosure

One of our core principles is our commitment to treat your data with caution and confidentiality. We will never sell your data to third parties. Your data may be disclosed to third parties only in the event that the Law imposes it and under the condition that it is permitted by the Law in force.

9. Storage and deletion of information

The Joint Controllers have access, use, process, store and store the personal information collected exclusively for the purposes indicated in this Privacy Policy and according to the consent expressed by the user, where necessary. In particular, the Joint Controllers collect personal information in line with: a. the purposes for which they were collected; b. the consent received from the user; c. national and international regulations.

Personal information is stored and deleted in accordance with the security policy of the Joint Controllers for the duration necessary to achieve the purposes for which the data were collected and then processed, including the data retention periods required pursuant to the Law. As an indication, the Joint Controllers store information regarding a request for information, until the user's request is answered and, in any case, as soon as possible, within the time limits laid down by Dutch law, while for the purpose of subscribing to the Newsletter until the user decides to unsubscribe from the Newsletter service.

10. Use of cookies

The Joint Controllers collect Personal Data through cookies.

What are cookies?

Cookies are small text strings that are sent from a website to the browser used by the user for navigation, stored on the device (e.g., Computer, Tablet, Smartphone, etc.) and retransmitted to the same site at the next visit of the user. Usually, a cookie is presented as a string containing at least the name of the website from which the cookie itself comes, the "duration" of the cookie, and a value, which is usually a randomly generated unique number. On the basis of the subject responsible for the management of cookies sent by a website, two types of cookies are distinguished:

- First-party: when they are managed directly by the owner and / or publisher of the website (the owner of this site)
- Third-party: when cookies are managed by subjects unrelated to the website visited by the user.

First-party cookies: Cookies play an important role in surfing the net. We use cookies to improve and facilitate the user experience by storing, for example, some information about the browser used by the latter (for example language,

country, shopping cart, etc.) and avoiding having to re-enter them on subsequent visits to the site. The owner of this site does not use first-party cookies in order to track the online behaviour of users of websites managed for their own marketing purposes. Cookies do not allow us to recognize individual users who visit our websites, but only the browser used for navigation, unless the latter have logged in to their account.

What cookies do we use?

Below is the description of the types of first-party cookies sent by the site

- Technical cookies

Technical cookies are essential for the proper functioning of some sections of the site and are used to allow users normal navigation and the possibility of using the services available on our website, without which the latter could not function properly. We also use technical cookies to keep track, in accordance with current legislation of the consents given by users to the receipt of third-party profiling and analytics cookies. Our website uses or may use the following categories of technical cookies:

- Permanent cookies, that allow, for example, to:
 - Remember any actions performed by users (for example, completing a form) when returning to the previous page of a session
 - Session cookies, that are sent to the users' device/ browser to meet technical-functional needs (for example the transmission of session identifiers necessary for authentication to restricted areas) but are not stored permanently on the users' computer and deleted at the end of the "session" with the simple closure of the browser.
- Third-party cookies

While browsing our website it is possible that some cookies that do not belong to our domains (so-called Third Party cookies) are sent when, for example, users visit a page that includes content from a third-party website. Some Third Parties may send, through our site, cookies that allow us to understand the habits and preferences expressed by users while browsing, in order to allow the latter to adapt the advertisements shown on our websites. Some types of cookies, managed by Third Parties, also allow us to obtain aggregate statistical information relating to visits received and browsing habits, in order to improve the usability and performance of our sites. For greater clarity, the owner of this site reports below a list of the types of third party cookies that may send cookies while browsing our site and the related descriptions and pages / websites where you can consult the information regarding the use of these cookies and deny consent to the sending of the same.

What Third-party cookies do we use?

The website may send Third-party cookies belonging to the following types:

- Analytics Cookies. These cookies are used by the owner of this site, through Google Analytics, to collect and analyse aggregate and anonymous information for statistical analysis on accesses and visits in order to improve the performance and design of our website.
- Profiling Cookies. They allow us to obtain information about the navigation of users on our website and to recognize those who return to visit our website. No personal information, enabling the identification of the individual user and the consequent association with the advertising profile created is shared with the Third Parties. Below is a list of third parties that may send Analytics and / or profiling cookies while browsing our sites and the related links to the privacy policy and form for the revocation of consent to their receipt:

- Google Adwords <https://policies.google.com/privacy?hl=en>
- Facebook <https://www.facebook.com/about/privacy>

How we acquire consent to receive cookies.

In line with the provisions of current legislation, for the sending of third-party profiling and analytics cookies, during the first visit of users to our sites prior consent is required, which can be expressed in the following way:

- By clicking on the "Ok I accept all cookies" button or by flagging (X) on each individual cookie of the banner containing the brief information that appears when accessing the site.

How to change your browser preferences

Consent to the receipt of cookies can also be expressed through specific browser configurations by users. Most browsers allow you to set rules to manage cookies sent only by some or all sites, an option that gives users more precise control of privacy and to deny the possibility of receiving cookies. Below are the indications for the management of cookies through the settings of the main browsers:

- Google Chrome
- Mozilla Firefox
- Internet Explorer
- Safari

However, the owner of this site wishes to remember that the restriction of the ability of websites to send cookies may worsen the overall browsing experience of users.

How to disable cookies

If you prefer not to receive cookies, you can still change the settings of your Internet browser so that you are notified every time a cookie is proposed to your computer, or so that you can delete cookies already stored on your hard drive. Please note that by preventing us from placing cookies on your computer during your visit (including essential cookies), or by deleting cookies after they have been placed, you may affect the functionality of our site and compromise your effective use of them. This applies to all websites, as well as ours, once cookies are disabled via your browser settings. Most browsers (Internet Explorer, Firefox, Chrome, etc.) are configured to accept cookies. Cookies stored on the hard disk of the device can still be deleted and it is also possible to disable cookies by following the instructions provided by the main browsers, at the following links:

- Chrome: <https://support.google.com/chrome/answer/95647?hl=it>
- Firefox: <http://support.mozilla.org/it/kb/Eliminare%20i%20cookie>
- Internet Explorer: <http://windows.microsoft.com/it-it/internet-explorer/delete-manage-cookies#ie=ie-10>
- Opera: <https://help.opera.com/en/how-to-clear-browser-cache-history-cookies/>
- Safari: <https://support.apple.com/it-it/HT201265>

11. Data of users under the age of 18

The Site is not aimed at children under the age of 18 and the Joint Controllers do not deliberately collect personal information from them. In the event of accidental registration of any information on minors, the Joint Controllers will promptly delete it at the request of users.

12. Rights of the data subject in relation to personal information

Users are holders of the rights referred to in Articles 15-21 GDPR, including the right of access, the right to confirm, the right to be forgotten, the right to restriction of processing, the right to object, the right to withdraw consent to the processing (without prejudice to the lawfulness of the processing based on the consent acquired before the revocation), the right to lodge a complaint with the Supervisory Authority (Guarantor for the Protection of Personal Data) if you believe that the processing of your personal data is contrary to current legislation and finally in the cases provided for by art. 34 users will be sent immediate communication in case of a possible violation of personal data. In order to exercise the above rights and request information, users can write to the following e-mail address info@sisterschools.eu which will respond within a reasonable time, after verifying the identity of the user.

13. Contact Information

For any information, the user of the Site can contact, within the Joint Controllers, MoMo Education by Sister Schools Foundation, with registered office in Sarphatistraat 97-3 1018, Amsterdam, The Netherlands , telephone: +31-6-22920574.

Among others, the user can also request the updated list of Data Processors and persons in charge of processing. If you have any requests or comments about this Privacy Policy, MoMo Education by Sister Schools Foundation may be contacted at the references above.

14. Changes to the Privacy Policy

For legal and/or organisational reasons, this Privacy Policy may be subject to change; we recommend, therefore, to regularly check this Privacy Policy and consult the latest version of the same.