

INFORMATIVE NOTICE REGARDING THE PROCESSING OF DATA COLLECTED FROM STAFF

ICCRM, in adherence to its mission and institutional values, undertakes to protect personal data of natural persons regardless of their nationality or residence, respecting every human being's identity, dignity and fundamental freedoms in accordance with standards adopted regarding the processing and circulation of personal data. In pursuit of this undertaking, ICCROM will comply with accountability standards and implement consistent and appropriate safety measures and suitable policies.

Terms:

Personal Data	means any information relating to an identified or identifiable natural person ("Data Subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Processing	means any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Who we are and contact details

The Data Controller is ICCROM (International Centre for the Study of the Preservation and Restoration of Cultural Property), based in Rome, via di San Michele n. 13, Tel.: (+39) 06 585531; Fax: (+39) 06 58553349. The Data Controller may be reached at the following e-mail: data-protection@iccrom.org.

Scope of the present informative notice and to whom it is addressed

The present informative notice covers the processing of personal data related to employment and is addressed to ICCROM Staff.

Data categories and Processing – Scope and legal basis of processing

Personal data of the employee ("Person Concerned") are processed to comply with the obligations relating to the performance of the employment contract and to the overall employment relationship, in particular:

1. To manage the employment contract and maintain administrative, tax, welfare and insurance filings, and to be able to fulfil all contractual obligations and to guarantee the rights of the Person Concerned;
2. To safeguard employees' right to health and safety at work;
3. For institutional communications, training initiatives, questionnaires, projects or audit activities related to quality processes and procedures;
4. For the performance of all other activities related to normal operations and the organizational management of the work;
5. For the exercise of the right of the Data Controller to be able to implement, if necessary, defensive controls in order to exercise legitimate interests;
6. Only with the prior consent of the Person Concerned, personal data such as image and/or voice (e.g. photos, audios, videos) may be processed and published on the Organization's website or social media in order to promote ICCROM and/or its activities.

For the purposes referred to in points 1 to 5, the consent of the Person Concerned is not required. Failure to provide personal data required for these purposes will result in the inability to properly comply with the obligations of the employment contract. For the purposes referred to in point 6, failure to provide consent shall in no way prevent the full execution of the employment contract.

The legal basis for the processing of personal data can be found in:

- Contractual obligations;
- Social security, welfare and insurance requirements;
- Occupational safety obligations;
- Other legal obligations to which the Data Controller is subject;
- Training needs;
- The need to pursue a legitimate interest (e.g. right to defence and defensive controls) of the Data Controller; and
- Explicit consent.

Automated decisions

ICCROM will never adopt a decision which may relate to the Person Concerned based solely on automated processing. Any decision associated with personal data processing will be taken by a natural person.

Personal data sharing

Personal data shall be disclosed solely to recipients duly authorized by ICCROM. Personal data may/could be shared with recipients acting as processor(s) or as independent controller(s).

Personal data could be shared with (but not be limited to): a) entities providing information technology or telecommunication services (including, but not limited to, services such as e-mail, newsletters, website); b) entities providing security; or c) authorities charged by law or by decision of public bodies/entities to verify the fulfilment of obligation(s), when institutional purposes or public interest or public security are to be protected.

Data could even be shared with partners collaborating with the Organization on events, training courses, fellowships and scholarships, if deemed necessary to fulfil the aims of the collaboration.

Data retention period

Personal data will be processed by ICCROM solely for purposes declared in this Statement. The data may be stored for a longer period(s) solely for archiving purposes, in accordance with the Organization’s records retention schedule.

Rights of Data Subjects

Right of access	Data Subjects have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning them are being processed, to access such personal data and to obtain the following information: a) the purposes of the processing operation; b) the personal data categories concerned; c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular those in third countries or international organizations; d) the expected period of personal data storage or applicable criteria for determining such period; e) the existence of the right to request from the Data Controller rectification or erasure of personal data or restriction of processing of personal data concerning or to object to such processing; f) data source, if personal data are not being provided by Data Subjects themselves; g) existence of automated decision making process, including profiling and, in such cases, relevant information concerning applied logic, as well as importance and consequences for Data Subjects arising from the processing.
Right to rectification	Data Subjects have the right to amend inaccurate Personal Data. Taking into account the purposes of the processing, Data Subjects are entitled to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to erasure	Data Subjects have the right to request erasure of personal data to be obtained without unjustified delay and the Data Controller will be bound to erase Personal Data for any of the following reasons: a) Personal Data are no longer necessary to the purposes for which they were collected or processed; b) consent on which Data Processing is based has been withdrawn and there is no other legal basis for Processing; c) Data Subject has denied the right of Processing and there is no other prevailing legitimate reason for Personal Data Processing; d) Personal Data have been unlawfully processed. In some cases, the Data Controller will have the right not to erase Personal Data should the Processing be mandatory to fulfil legal obligations, for public interest reasons, for filing purposes in the public interest or for statistical use or establishment, exercise or defence of legal claims.
Right to limit processing	Data Subjects have the right to restrict processing in the following cases: a) the Data Subject contests the accuracy of the personal data (restriction will last for the time necessary for the Data Controller to assess accuracy of the data); b) the processing is unlawful, and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead; c) the Data Controller no longer needs the personal data for processing but they are required by the Data Subject for establishment, exercise or defence of legal claims; d) the Data Subject objects to the data processing and is awaiting verification whether the Data Controller's legitimate grounds override those of the Data Subject. Should a processing restriction apply, personal data will only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.
Right to data portability	Data Subjects have the right to request and obtain any personal data they have provided to the Data Controller in a structured, commonly used and legible format or to ask for the data to be transmitted to another Data Controller, where technically feasible. In such case, the Data Subject shall be bound to give specific authorization in written form regarding the new Data Controller to whom the personal data is to be transferred.
Right to object	Data Subjects have the right to object, in any situation, for reasons related to their personal situations, to the processing of personal data related to them, included profiling. The Data Controller will refrain from further processing operations on the data in question, unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedom of the data subject, or for the establishment, exercise or defence of a legal claim.

The undersigned hereby gives consent to the processing of his/her personal data, being aware that the consent given with this declaration can be revoked at any time by contacting the following e-mail: data-protection@iccrom.org.

Data Controller

ICCROM

In regard to data processing purposes stated at par. 6 (concerning permission for the Data Controller to disclose and publish photographic, audio and video materials through the Data Controller's institutional website or other communication means), the undersigned

Does consent Does not consent

Date: _____

Full name: _____

Signature: _____