



**VELASCATUTORS**

*Nabla Squared S.r.l.*

Via San Vito 18, 20123 - Milano (MI), Italy

Phone: +39 02 8715 6050

[info@velascatutors.com](mailto:info@velascatutors.com)

[www.velascatutors.com](http://www.velascatutors.com)

---

**Document Title:** Terms & Conditions of Service – Information on the  
Processing of Personal Information and Data

**Document ID:** W0004

---

## **Ref: Information on the Processing of Personal Information and Data**

In compliance with art. 13 Regulation EU 2016/679 (hereinafter, "GDPR"), NABLA SQUARED S.R.L., VAT n. 11293420961, under the direction of the sole administrator Joe Chalon, born in Milan, Italy on the 01/01/2002, with legal headquarters in Milan, Via San Vito, 18 - 20123, PEC [nablasquared@pec.it](mailto:nablasquared@pec.it), as Data Controller, informs you that your data will be processed in the following manner and for the following purposes:

### **1. SCOPE OF PROCESSING**

The Data Controller processes personal data ("any information relating to an identified or identifiable natural person, even indirectly, through other information, including an identification number") that is provided by completing integrated or third-party online forms in various sections of the Website.

The personal data processed may include, but are not limited to: name, surname, date and place of birth, tax code, telephone number, e-mail address, residence, attended school and degree, spoken languages and related level of knowledge, UCAS credentials, school subjects attended and related level of knowledge and information on the subjects exercising parental responsibility (name, surname, tax code, telephone number, e-mail address).

If the personal data in question is related to minors of 16 years of age, the processing is carried out only if consent is expressly provided or authorized by a parent or legal guardian. Without the latter, by default and in all circumstances, the information provided will be deleted and it will not be possible for NABLA SQUARED S.R.L. to provide the requested services, regardless of other agreements.

### **2. PURPOSE AND METHODS OF PROCESSING**

Data processing occurs via manual, computerized and telematic processes, primarily, but not solely, for the following purposes:

- a. Tutor selection;
- b. Registering on the Velasca Tutors website, to provide and manage the various services offered by Data Controller;
- c. To allow for communication between students, tutors, parents, both within the Velasca Tutors website, its affiliate LearnCube, and through other third parties such as e-mail providers;
- d. Carry out marketing activities such as sending of promotional material and advertising of Data Controller, including by e-mail and text messages;
- e. Respond to requests pertaining to the services offered by Data Controller sent by interested parties through the Website ("Contact Us" section), via email or other avenues of inquiry;
- f. Administrative and accounting, pivotal to the provision, management and organisation of services offered by NABLA SQUARED S.R.L.

All data processing occurs in adherence to principles of confidentiality, integrity and transparency. This also applies to communication with third parties, even beyond the period in which services are being offered by NABLA SQUARED S.R.L. to the user in question.

### **3. NATURE OF DATA PROVISION AND CONSEQUENCES OF REFUSING REPLY**

The provisions regarding data handling outlined in Art. 2.1), 2.2), 2.3), 2.5) e 2.6) of this document are, for all intents and purposes, mandatory. Consequently, refusing to accept and abide by said Terms of Service entails that NABLA SQUARED S.R.L. will not be able to provide services, regardless of their nature or the agreement that stipulates them.

The provision regarding the employment of personal data for the purposes referred to in Art. 2.4 (marketing) are optional, and may thus be revoked at any time using the "*unsubscribe*" feature contained in all commercial messages sent by NABLA SQUARED S.R.L.

### **4. COMMUNICATION AND DISCLOSURE**

Your personal data remains accessible for the purposes referred to art. 2):

- to employees and collaborators of Data Controller, including – but not limited to – external or internal data processors, controllers and system administrators;
- to third parties (for example, providers of forms or other functions that appear on the website, etc.) who carry out outsourced activities on behalf of Data Controller, as external data controllers.

Without requiring further explicit consent, NABLA SQUARED S.R.L. may disclose your personal data to insurance companies for related insurance services, and to those subjects with whom communication is mandatory and which will treat your data as independent data controllers.

By using our service and thus by accepting our Terms & Conditions of Service, you also agree that NABLA SQUARED S.R.L. holds the right to share and transfer client/tutor data to other third parties, in compliance with art. 13 Regulation EU 2016/679.

### **5. DATA TRANSFER**

Personal Data can be and is stored on multiple servers, both within and beyond Italy's borders, always inside the European Union.

### **6. RIGHTS OF DATA SUBJECT**

Being subject to the Data handling policies outlined in this document, one reserves the ability to exercise the various rights related to the processing and in accordance to art. 15, 16, 17, 18, 19, 20 e 21 of GDPR.

Specifically, one can:

#### **Art. 15 - Right of access by the data subject**

1. *The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:*
  - a. *the purposes of the processing;*
  - b. *the categories of personal data concerned;*
  - c. *the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;*
  - d. *where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;*
  - e. *the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;*
  - f. *the right to lodge a complaint with a supervisory authority;*
  - g. *where the personal data are not collected from the data subject, any available information as to their source;*
  - h. *the existence of automated decision-making, including profiling, referred to in Article 22 (1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.*
2. *Where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.*
3. *The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.*
4. *The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.*

### **Art. 16 - Right to Rectification**

*The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.*

### **Art. 17 - Right to Data Erasure (a.k.a. Right to be Forgotten)**

1. *The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:*

- a. *the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;*
- b. *the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing;*
- c. *the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);*
- d. *the personal data have been unlawfully processed;*
- e. *the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;*
- f. *the personal data have been collected in relation to the offer of information society services referred to in Article 8(1).*

2. *Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.*

3. *Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:*

- a. *for exercising the right of freedom of expression and information;*



- b. for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;*
- c. for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3);*
- d. for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or*
- e. for the establishment, exercise or defence of legal claims.*

#### **Art. 18 - Right to Restriction of Processing**

- 1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:*
  - a. the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal 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 controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;*
  - d. the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.*
- 2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, 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 of the Union or of a Member State.*
- 3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.*

### **Art. 19 – Obligation to Notify Changes or Applications of Data Handling Policy**

*The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.*

### **Art. 20 – Right to Data Transfers**

1. *The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:*
  - a. *the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and*
  - b. *the processing is carried out by automated means.*
2. *In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.*
3. *The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.*
4. *The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.*

### **Art. 21 – Right to Object**

1. *The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. Consequently, the controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.*
2. *Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.*

3. *Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.*
4. *At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.*
5. *In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.*
6. *Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.*

## **7. DETAILS OF DATA CONTROLLER**

The data controller is NABLA SQUARED S.R.L., VAT n. 11293420961, under the direction of the sole administrator Joe Chalon, born in Milan, Italy on the 01/01/2002, with legal headquarters in Milan, Via San Vito, 18 - 20123, PEC [nablasquared@pec.it](mailto:nablasquared@pec.it).

## **8. HOW TO EXERCISE YOUR RIGHTS**

You can exercise your rights by sending an e-mail to the following e-mail address: [privacy@velascatutors.com](mailto:privacy@velascatutors.com).

## **9. CHANGES TO THIS INFORMATION**

The information that appears in this document undergoes periodic revision. It therefore is advisable to regularly check the document and read any potential changes. To reiterate, by using any and all services provided by NABLA SQUARED S.R.L., users agree to the latest version of the company's Terms and Conditions of Service, as outlined in this document.



---

(Nabla Squared S.r.l.)