

# Erasmus + KA 201 "NEMO - NEw MOnitoring guidelines to develop innovative ECEC teachers curricula"

## **Privacy Policy**

pursuant to article 13 of Regulation (EU) 2016/679

#### Data controller

Alma Mater Studiorum - University of Bologna (registered office: Via Zamboni 33, 40126 - Bologna, Italy; email: privacy@unibo.it; PEC certified email: <a href="mailto:scriviunibo@pec.unibo.it">scriviunibo@pec.unibo.it</a>)

Aias Bologna Onlus – (Registered office: Piazza della Pace 4/a, 40134 Bologna, Italia; Telefono 051 454727 – Fax 051 466105 Email: <u>info@aiasbo.it</u> PEC: <u>aiasbo@legalmail.it</u>)

#### **Data Protection Officer**

Data Protection Officer at Alma Mater Studiorum - University of Bologna (RPD/DPO) (registered office: Via Zamboni 33, 40126 - Bologna, Italy; email: dpo@unibo.it; PEC certified email: <a href="mailto:scriviunibo@pec.unibo.it">scriviunibo@pec.unibo.it</a>)

AIAS Bologna Onlus RDP/DPO: Laura Maccherini e-mail: <a href="mailto:lmaccherini@aiasbo.it">lmaccherini@aiasbo.it</a>, tel. 051 454727.

Pursuant to art. 13 of Regulation (EU) 2016/679 (General Regulation on the protection of personal data), we inform you that Alma Mater Studiorum - University of Bologna and Aias Bologna Onlus, as Data Controllers, will process your child's data in compliance with the provisions of Regulation (EU) 2016/679 (General Regulation on the protection of personal data) and Italian Legislative Decree no. 196 of 30 June 2003 as amended (Personal Data Protection Code).

## 1. Processing purposes and methods

For the project "NEMO - NEw MOnitoring guidelines to develop innovative ECEC teachers curricula", you are asked to provide your child's data. More specifically, you are asked to provide audiovisual data that will be processed solely for scientific and statistical research purposes.

The project uses qualitative and quantitative methods to study the structure of interactions between caregivers and children of pre-school age between 9 and 18 months, highlighting the interactional differences between neurotypical children and children who were later diagnosed with Autistic Spectrum Disorder.

The purpose of this processing is to improve a preventive screening methodology that can be combined with the existing ones to provide nursery teachers with tools that allow a more effective and timely intervention in the identification and treatment of children with ASD. Preventive action at an early age allows for definite improvement in the living conditions and interactional possibilities of these people.

## 2. Data processing within the project

With this document, we intend to give you all the information necessary to be able – with your consent – to process your child's personal data, including recordings of voice and images in any audiovisual material provided or recorded.

#### 2.1 Participation in the research project

Video analysis will be conducted using a method developed in the Department of Philosophy and Communication of the University of Bologna that allows isolating caregivers-child interaction patterns through analysis based on a semiotic methodology.

The information extracted from the material provided will then be used anonymously to create a training and preparation course for nursery and pre-school teachers on the recognition of atypical patterns of interaction and for the dissemination of scientific results.

The video recordings will in no way be made public or disclosed to third parties not participating in the project. However, it should be pointed out that even in particular circumstances and for a period limited to the complete analysis of the video, indirect identification of your child may be possible. In this case, the University will:

- Process the data using specifically designated researchers.
- Pseudonymise audio-video recordings using a video identification code that cannot be traced back to the people filmed.
- Manage the subsequent processing and storage of the collected data in such a way that the data subjects are not directly identified thanks to anonymization and pseudonymization procedures.
- The recording could also be disseminated/published (e.g., in scientific journals, internet, databases accessible to other researchers, etc.) after complete anonymization so that it can in no way be traced back to you or your child.

## 2.2 Disclosure and dissemination of Videos without identifying data

Please note that if the video should prove to be socially significant and usable as a typical example of interaction, for the purposes described above and with your consent, it could be disclosed to other research partners (organizations, universities and/or associations in Europe) and/or disseminated anonymously.

Anonymisation or pseudonymization will be implemented, as far as possible, hiding parts of the video that are not necessary for the pursuit of the project's aims. However, some facial and bodily features may not be hidden, only if they are particularly significant for the realization of the research objectives.

The only visible traits will be those pertaining to the research.

Please, note that the disclosure or dissemination of the data described above will take place with your consent only after an assessment of the relevance for the project. Moreover, the recording could, always after anonymization, be disseminated/published (e.g., in scientific journals, internet, databases accessible to other researchers, etc.).

#### 2.3 Data retention for future research

Considering that new discoveries could lead to new opportunities for researchers to investigate or allow further studies and research on data for the project in question, you can consent to the storage of your child's data in a non-anonymous form on the encrypted platform of the University of Bologna for a prolonged period of time, agreeing to be contacted so that you can provide a new specific consent if you consider it appropriate and thus authorize new research on your child's data.

### 3. Legal basis and nature of data provision

Pursuant to art. 6, paragraph 1, letter a) of Regulation (EU) 2016/679, the legal basis for such processing is your free and optional consent.

Participation in the project is optional.

The provision of the data referred to in point 2.1 is not mandatory, but it is indispensable for the performance of the study. Refusal to provide them will make it impossible for your child to participate in it.

The provision of the data referred to in point 2.2 is optional, i.e., it does not derive from a regulatory obligation, but is necessary to allow the disclosure and/or dissemination of your child's data as described above. Failure to provide the data for these purposes leads to the impossibility of carrying out what has been described above.

The provision of data for the purposes referred to in point 2.3 is optional, i.e. it does not derive from a regulatory obligation, but it is necessary to allow the data to be stored in a non-anonymous form for a longer period than needed for the conclusion of this study and to allow the Data Controllers to contact you again so that you can, if you so desire, consent and authorise new research on your child's data. Failure to provide data for these purposes will only make it impossible to carry out what has been described above.

## 4. Data retention period

The data referred to in point 2.1. will be processed with computers and electronic devices and will be kept only for the time strictly necessary for the transcription of the contents and their anonymization, and, in any case, no later than the conclusion of this study.

The data referred to in point 2.2. will be processed with computers and electronic devices and will be stored until the conclusion of this study.

The data referred to in point 2.3. will be processed by computers and electronic devices and will be stored for a period of 5 years after the conclusion of this study.

## 5. Rights of the data subject

Without prejudice to the restrictions on the data subject's rights as set forth in articles 2-undecies and 2-duodecies of the Personal Data Protection Code, as the parental authority of the data subject you may exercise the rights granted to your child pursuant to and within the limits of articles 15-21 of the Regulation, including the right to request access to, correction or erasure of personal data, as well as the restriction of the processing of his/her personal data, opposition to the processing and portability of the data. However, such a request may only be made before the data provided is made anonymous.

We also point out that any consent given by you is freely given and may be withdrawn at any time without any disadvantage or prejudice to your child and without prejudice to the lawfulness of the processing based on the consent given before the withdrawal.

Requests relating to the exercise of these rights may be submitted to:

- -Alma Mater Studiorum University of Bologna by contacting the Department of Philosophy and Communication (FilCom) Administrative offices Via Azzo Gardino 23, 40122 Bologna tel: 051 20 92200.
- Aias Bologna Onlus Piazza della Pace 4/a, 40134 Bologna, Italy. Tel. 051 454727 <u>Fax</u> 051 466105 <u>Email</u>: <u>info@aiasbo.it</u> PEC: aiasbo@legalmail.it

Finally, if you believe that the processing of your child's personal data is in violation of the provisions of Regulation (EU) 2016/679 or of Italian Legislative Decree 196/03 as amended, you have the right to lodge a complaint with the Privacy Authority as envisaged in art. 77 of the aforementioned Regulation, or to take appropriate legal action (art. 79 of the Regulation).

## **Consent to the processing of personal data**

I, the undersigned		born or
		tel
	email	
1 1 (*)		
as legal representative (*)(specify whether a parent, guardian, tru	stee, support administrator)	
of (specify the name of the minor consent		
(specify the name of the minor consent	is being given for)	
born on	in	
	03, having read the Privacy Po	·
	v -	for statistical and scientific research
	consent do not co	onsent
to the processing of my child's dincluding the disclosure and d	ata, even of a special nature, j issemination of interviews, ir	for statistical and scientific research, the manner and for the purposes terviews without identifying data];
	consent do not co	
to the storage and further use of in paragraph 2.3 [data retention		ne purposes and in the manner set ou
Date	Signature	

## Parent 2 I, the undersigned on in tel. \_\_\_\_email \_\_\_\_ as legal representative (\*) (specify whether a parent, guardian, trustee, support administrator) of \_\_\_\_\_\_ (specify the name of the minor consent is being given for) born on \_\_\_\_\_\_ in \_\_\_\_\_ in accordance with the provisions of Regulation (EU) 2016/679 and Italian Legislative Decree 196/2003, having read the Privacy Policy above, consent do not consent to the processing of my child's data, even of a special nature, for statistical and scientific research *in the manner and for the purposes described in paragraph 2.1 [participation in the project];* do not consent to the processing of my child's data, even of a special nature, for statistical and scientific research, including the disclosure and dissemination of interviews, in the manner and for the purposes described in paragraph 2.2 [disclosure and dissemination of interviews without identifying data]; consent do not consent

to the storage and further use of my child's personal data for the purposes and in the manner set out

Signature \_\_\_\_\_

*in paragraph 2.3 [data retention for future research].* 

Date \_\_\_\_\_

#### ${\bf Administration}$