

# Privacy and Cookie Policy

Version 2.0 – April 2026

## 1. Data Controller

The data controller for personal data collected through this website is **The Florence Academy of Art** (Fondazione Florence Academy of Art), an Italian non-profit corporation.

- Florence (main establishment): Via Aretina 293, 50136 Florence, Italy
- VAT: 06939070485
- Italian fiscal code: 94277940485
- Email: info@florenceacademyofart.edu
- Certified e-mail address (PEC): ffaa@pec.it
- Florence/: +39 055 245444

As the main establishment is located in Italy, the lead supervisory authority for GDPR purposes is the **Garante per la Protezione dei Dati Personali**.

## 2. Scope

This Privacy and Cookie Policy applies exclusively to visitors browsing the websites [florenceacademyofart.edu](http://florenceacademyofart.edu) and [florenceacademyofart.se](http://florenceacademyofart.se). It describes the personal data collected during browsing, the legal bases for processing, the purposes of processing, and the rights available to data subjects under applicable law.

This policy does not apply to personal data collected from students, applicants, staff, or alumni, which are governed by separate privacy notices.

## 3. Personal Data Collected During Browsing

### 3.1 Technical data

When a visitor accesses the website, the web hosting infrastructure automatically records technical information in server logs. This may include the visitor's IP address (partially anonymised – see Section 5), date and time of access, URL of the page visited and referring URL, browser type and version, and operating system.

This data is processed solely to ensure the security and correct functioning of the website. It is not used to identify individuals personally and is not combined with any other data.

Legal basis: legitimate interests of the data controller (Art. 6(1)(f) GDPR), consisting in the protection of the security and integrity of the website. A summary will be made available upon written request to be

sent to [it@florenceacademyofart.edu](mailto:it@florenceacademyofart.edu) these interests are not overridden by the fundamental rights and freedoms of data subjects, given the purely technical and non-profiling nature of the processing.

### 3.2 Data provided voluntarily

Where a visitor contacts the Academy directly by email or through a contact form, only the information voluntarily provided (e.g. name and email address) is collected, for the sole purpose of responding to the enquiry.

Legal basis: legitimate interests (Art. 6(1)(f) GDPR) in handling incoming general communications not relating to course enrolment or the provision of services, or pre-contractual measures (Art. 6(1)(b) GDPR) where the enquiry concerns course enrolment or the provision of services.

## 4. Cookies and Tracking Technologies

In accordance with the GDPR, the Italian Privacy Code (Legislative Decree 196/2003, as amended by Legislative Decree 101/2018), and the Guidelines on Cookies and Other Tracking Tools issued by the Garante per la Protezione dei Dati Personali (10 June 2021), the following categories of cookies are used on this website:

### 4.1 Technical cookies — no consent required

Technical cookies are strictly necessary for the website to function and to provide the service requested. They include session and navigation cookies. These cookies are set automatically and cannot be disabled without affecting the visitor's ability to use the website.

Legal basis: strictly necessary for the provision of the service, pursuant to Art. 122 of the Italian Privacy Code and the Garante's 2021 Guidelines. No prior consent is required.

### 4.2 Analytics cookies — conditional exemption from consent

Analytics cookies may be used to produce aggregate statistics on website usage. In accordance with the Garante's 2021 Guidelines, analytics cookies are assimilated to technical cookies — and therefore do not require prior consent — only if all of the following conditions are met simultaneously:

- It is not possible to identify individual users from the data collected;
- The analytics tool masks at least one quarter (1/4) of the visitor's IP address (for both IPv4 and IPv6);
- The anonymised data is not combined with any other information held about the visitor;
- The data is not shared with third parties for their own independent purposes;
- Statistics are produced solely in relation to this website or app.

Where any of the above conditions is not met, analytics cookies are set only with prior, freely given, specific, informed and unambiguous consent, collected via the cookie consent banner.

### 4.3 Third-party and embedded content cookies — consent required

Certain pages may include embedded content from third-party services (e.g. YouTube, Google Fonts). These services may set their own cookies and collect data relating to visitor interactions with that content, subject to their own privacy policies.

Such cookies are set only with prior consent. By default, embedded third-party content is blocked until consent is obtained via the cookie banner.

**Third-Party Cookies and External Links** In compliance with the Italian Data Protection Authority (Garante) requirements for third-party cookies, we provide direct links to the information and consent modules of the providers. For Google Analytics 4, which is the only third-party analytical tool used on this website, please refer to:

- **Provider:** Google Ireland Limited
- **Privacy Policy:** <https://policies.google.com/privacy>
- **How Google uses information from sites or apps that use our services:** <https://policies.google.com/technologies/partner-sites>
- **Browser Opt-out Add-on:** <https://tools.google.com/dlpage/gaoptout>

When Google Fonts is loaded from Google's servers, the visitor's IP address is transmitted to Google's infrastructure in the United States. Where technically feasible, fonts are self-hosted to avoid this transfer. Where self-hosting is not in place, Google Fonts is treated as a third-party service subject to consent.

## 5. Cookie Consent Banner

In compliance with the Garante's 2021 Guidelines and GDPR Art. 7, a cookie consent banner is displayed on the visitor's first access to the website. The banner complies with the following requirements:

- It appears prominently before any non-technical cookies are set;
- It presents accept, refuse, and customise options with equal visual prominence — no design choices that favour acceptance over refusal (no dark patterns);
- Scrolling or continued browsing alone does not constitute valid consent;
- Closing the banner via the 'X' button leaves settings at default (technical cookies only) and is not treated as consent;
- No cookie wall is in place: access to website content is not conditional on accepting non-essential cookies.

Visitors may update their cookie preferences at any time via the Cookie Settings link in the footer of every page. Consent records are maintained in accordance with the accountability principle (GDPR Art. 5(2)).

## 6. Third-Party Processors

Personal data is shared only with third-party processors bound by Data Processing Agreements (DPA) ensuring GDPR compliance. Processors relevant to website visitors are as follows:

### [The Florence Academy of Art — Sweden \(FAA Sweden\)](#)

Address: Götaforsliden 17, 431 34 Mölndal, Sweden.

Email: [info@florenceacademyofart.se](mailto:info@florenceacademyofart.se)

As a branch of the Academy, FAA Sweden processes personal data relating to students and applicants who apply for or attend courses delivered at the Swedish location. Personal data is shared between the main establishment in Italy and the Swedish branch for academic management, admissions, and administrative purposes. As the branch is located within the European Economic Area (EEA), all processing activities are subject to the GDPR and overseen by the Swedish Authority for Privacy Protection (*Integritetsskyddsmyndigheten — IMY*).

## [Groweb S.r.l. – Web Hosting](#)

The websites are hosted and managed by Groweb S.r.l. (P.IVA 06846430483), a web agency based in Florence, Italy (info@groweb.it). Groweb acts as a data processor on behalf of the Academy in relation to technical server log data. As an Italian-based provider, Groweb operates within the European Economic Area and is subject to the GDPR and the Italian Privacy Code. A Data Processing Agreement (DPA) pursuant to GDPR Art. 28 is in place between the Academy and Groweb.

## [Google LLC – Analytics and/or Fonts](#)

Depending on the visitor's cookie consent choices, Google LLC may process data (including partial IP address) in connection with Google Analytics and/or Google Fonts. Google LLC is certified under the EU–U.S. Data Privacy Framework (DPF), upheld by the General Court of the EU on 3 September 2025. Standard Contractual Clauses (SCCs, European Commission Decision 2021/914/EU) are also in place as an additional safeguard.

## [YouTube \(Google LLC\) – Embedded video content](#)

Where YouTube videos are embedded, YouTube may set cookies and collect data upon interaction with the video player. Content is loaded only with prior consent. YouTube is operated by Google LLC and subject to the same transfer safeguards described above.

## [Jotform Inc. – Online Application Forms](#)

The Academy uses Jotform to collect and manage course applications and enquiries. Jotform Inc. acts as a data processor, and a Data Processing Agreement (DPA) pursuant to GDPR Art. 28 is in place. Although Jotform Inc. is a U.S.-based company, the Academy has activated the "GDPR Data Center" option, ensuring that all submission data and uploaded files are stored exclusively on servers located within the European Union (Frankfurt, Germany). This ensures that personal data relating to applicants remains within the European Economic Area (EEA) in compliance with storage limitation and security principles.

## [C&C Consulting S.r.l. – IT Infrastructure & Systems Management](#)

The Academy engages C&C Consulting S.r.l. (P.IVA 05658010721) for the technical management, maintenance, and security of its IT systems and server infrastructure. C&C Consulting acts as a data processor pursuant to GDPR Art. 28, ensuring that all technical interventions and system administration activities comply with the Academy's security protocols and current data protection regulations.

## [Arcolink S.r.l. – Data Center and Hosting Services](#)

The server infrastructure managed by C&C Consulting is physically hosted by Arcolink S.r.l. (P.IVA 02150360350), an Italian provider with data centers located in Italy. Arcolink acts as a sub-processor, providing the secure physical environment and network connectivity. All data remains within the European Economic Area (EEA).

## [Pronet Firenze S.r.l. – Network Security & Disaster Recovery Services](#)

The Academy engages Pronet Firenze S.r.l. (P.IVA 05534150481) for the management of internal network infrastructure, firewall security, and data backup services, including anti-worm and disaster recovery solutions. Pronet Firenze acts as a data processor pursuant to GDPR Art. 28, providing essential technical

measures to ensure the availability, integrity, and resilience of the Academy's data systems. All backup data is stored securely within the European Economic Area (Italy).

The Academy does not sell, trade, or rent personal data collected through its websites to any third party.

## 7. International Data Transfers

Where personal data is transferred outside the European Economic Area (EEA) — for example to Google LLC in the United States — the transfer is subject to one or more of the following safeguards:

- The EU–U.S. Data Privacy Framework (DPF) adequacy decision, where the recipient is DPF-certified;
- Standard Contractual Clauses (SCCs) pursuant to the European Commission Decision of 4 June 2021 (2021/914/EU), supplemented by transfer impact assessments where required.

No transfers are made to third countries without an adequate level of protection or one of the above safeguards in place.

## 8. Data Retention

Personal data is retained only for as long as necessary for the purposes for which it was collected, in accordance with the principle of storage limitation (GDPR Art. 5(1)(e)):

- Server logs (including partial IP addresses): maximum 30 days, after which they are deleted or irreversibly anonymised.
- Contact enquiries: up to 12 months from the date of last contact, or longer where an ongoing relationship exists on the basis of the legitimate interest and/or when explicit consent has been given.
- Cookie consent records: 12 months, or until consent is withdrawn or updated.

Upon expiry of the applicable retention period, data is deleted or irreversibly anonymised in accordance with the Academy's internal Data Retention and Destruction Policy.

## 9. Security Measures

The Academy implements appropriate technical and organisational measures to protect personal data against unauthorised access, accidental loss, destruction or alteration, in accordance with GDPR Art. 32. Measures in place include:

- TLS/SSL encryption for all data transmitted to and from the websites (HTTPS);
- Access controls and authentication requirements for administrative systems;
- Security monitoring for unauthorised access attempts, bot traffic, and malicious activity;
- Regular review of access rights and security configurations;
- Data Processing Agreements with all third-party processors.

In the event of a personal data breach likely to result in a risk to the rights and freedoms of data subjects, the Garante per la Protezione dei Dati Personali will be notified within 72 hours of the Academy becoming

aware of the breach (GDPR Art. 33). Where the breach is likely to result in a high risk to individuals, affected data subjects will be notified without undue delay (GDPR Art. 34).

## 10. Rights of Data Subjects

Data subjects whose personal data is processed by the Academy have the following rights under GDPR Articles 15–22, subject to applicable legal limitations and exemptions:

- Right to be informed (Art. 13–14): to receive clear information about data processing — provided by this policy.
- Right of access (Art. 15): to obtain confirmation of whether personal data is being processed and, if so, to receive a copy.
- Right to rectification (Art. 16): to request correction of inaccurate or incomplete personal data.
- Right to erasure (Art. 17): to request deletion where there is no longer a legal basis for processing.
- Right to restriction of processing (Art. 18): to request temporary limitation of processing in certain circumstances.
- Right to data portability (Art. 20): to receive personal data in a structured, commonly used and machine-readable format, where processing is based on consent or contract.
- Right to object (Art. 21): to object to processing based on legitimate interests. Processing will cease unless compelling legitimate grounds overriding the data subject's interests, rights and freedoms can be demonstrated.
- Right to withdraw consent (Art. 7(3)): cookie consent may be withdrawn at any time via the Cookie Settings link in the website footer. Withdrawal does not affect the lawfulness of prior processing.

Requests to exercise any of the above rights (other than cookie consent, which is managed directly via the banner settings) should be submitted to [info@florenceacademyofart.edu](mailto:info@florenceacademyofart.edu). The Academy will respond within one calendar month of receipt of the request, extendable by two further months for complex or multiple requests, with notification.

Data subjects also have the right to lodge a complaint with the competent supervisory authority:

- Italy: Garante per la Protezione dei Dati Personali — [www.garanteprivacy.it](http://www.garanteprivacy.it)
- Sweden: Integritetsskyddsmyndigheten (IMY) — [www.imy.se](http://www.imy.se)

## 11. Course Applicants — Processing of Application Data

This section applies to individuals who submit an application for a course at The Florence Academy of Art via the online application form, operated through the third-party platform Jotform.

### Types of personal data collected

The following personal data is collected in the course of the application process:

- Biographical information: full name, date of birth, nationality, sex, country of residence;
- Contact information: email address, postal address, telephone number;
- Academic and professional background: previous education, qualifications, relevant work or artistic experience, and academic or professional goals;
- Application materials: portfolio of work, personal statement or letter of motivation;
- References: name, position, and contact details of referees provided by the applicant.

## Purposes of processing

Personal data collected through the application form is processed for the following purposes:

- To receive, assess, and process applications for courses offered by the Academy;
- To contact applicants regarding the outcome of their application and any related procedural steps;
- To verify the academic and professional suitability of applicants for the programme applied for;
- To prepare the student record of applicants who are offered and accept a place;
- To produce aggregate, anonymised statistical analysis of application trends for internal planning purposes.

## Legal basis

Personal data is processed under the following legal bases:

- Pre-contractual measures at the request of the data subject (Art. 6(1)(b) GDPR): processing is necessary to take steps prior to entering into a contract for the provision of educational services;
- Legitimate interests of the Academy (Art. 6(1)(f) GDPR): in assessing applications, maintaining records of the admission process, and improving the Academy's educational offering. These interests have been assessed as not overriding the fundamental rights and freedoms of applicants.

No special category data within the meaning of GDPR Art. 9 is collected or processed in the application process. The data collected and/or processed is not used as indirect indicator of special categories of data within the meaning of GDPR Art. 9, nor for profiling or automated decision-making purposes.

## Processors and recipients

Application data is collected and stored via Jotform Inc., which acts as a data processor on behalf of the Academy. A Data Processing Agreement (DPA) is in place with Jotform. Jotform complies with GDPR requirements and the EU-U.S. Data Privacy Framework (DPF). For further information, see [jotform.com/privacy/](https://jotform.com/privacy/).

Application data may be shared internally with the following entities within the Academy's organisational structure, strictly for the purposes described above:

- ITAL S.R.L. (Florence, Italy): for the purpose of issuing student identity cards and preparing studio space allocations for admitted applicants;
- The Florence Academy of Art — Sweden (FAA Sweden): where an applicant has applied for or is being considered for a programme delivered at the Swedish branch, relevant application data will be shared with FAA Sweden for assessment purposes.

Data is not shared with any other third party except where required by applicable law or by order of a competent authority.

## Data retention

Application data is retained in accordance with the following periods:

- Applicants not offered a place, or who decline an offer: data is retained for 2 years from the date of the final decision, after which it is deleted. This period allows for the handling of any queries, appeals, or complaints arising from the last application process.
- Applicants who accept a place and enrol: application data is transferred to the student record and retained in accordance with the Academy's student data retention policy (generally 5 to 7 years from the end of the academic programme), subject to applicable legal obligations.
- Portfolio materials and personal statements: retained for the same period as the application data to which they relate, and deleted accordingly. They are not used for any purpose other than the assessment of the relevant application.

## Rights of applicants

Applicants have the same rights as all data subjects under GDPR Arts. 15-22, as set out in Section 10 of this policy. Requests may be submitted to [info@florenceacademyofart.edu](mailto:info@florenceacademyofart.edu). The Academy will respond within one calendar month of receipt.

## 12. Automated Decision-Making and Profiling

The Academy does not carry out automated decision-making or profiling that produces legal effects or similarly significantly affects website visitors or applicants, within the meaning of GDPR Art. 22. All application assessments are conducted by Academy staff.

## 13. Minors

This website is not directed at minors. In Italy, pursuant to GDPR Art. 8 and Art. 2-quinques of the Italian Privacy Code, the minimum age for valid consent to information society services is 14 years. Personal data of individuals under the age of 14 will not be knowingly collected without verifiable consent from a holder of parental responsibility. Where such data is identified, it will be deleted without delay.

## 14. Links to Third-Party Websites

This website may contain links to third-party websites. The Academy has no control over and assumes no responsibility for the privacy practices or content of those sites. Visitors are encouraged to review the relevant privacy policies before submitting personal data to any third-party website.

## 15. Amendments to This Policy

This policy may be updated at any time to reflect changes in applicable law, supervisory authority guidance, or website operations. Material amendments will be indicated by updating the version number and date. For significant changes affecting the rights of data subjects, additional notification measures will be taken. Periodic review of this page is recommended.

*Last Updated: April 2026 — Version 2.0 | The Florence Academy of Art*