



**PRIVACY INFORMATION**  
**FOR HEALTH PROTECTION PURPOSES**  
(Articles 13 - 14 of Regulation (EU) 2016/679 and the Privacy Code as subsequently amended and supplemented)

The Azienda Sanitaria locale Roma 1 (Rome 1 Local Health Authority), with registered address situated in via Borgo Santo Spirito 3, 00193 Rome (RM) (hereinafter, "ASL Roma 1" or "Data Controller"), in its capacity as Data Controller in charge of the processing under Articles 13 - 14 Regulation (EU) No. 679/2016 (hereinafter, "GDPR") and the Privacy Code, as amended by Legislative Decree No. 101/2018

**INFORMS**

the patient/ data subject that the personal data will be processed in the manner and for the purposes set out below:

**1. Purposes and legal basis of the processing**

The personal data processing takes place in accordance with the principles enshrined by Article 5 of the GDPR and is carried out for the institutional purposes associated with or instrumental to the activity of Data Controller within the limits laid down by laws or regulations, more specifically:

- healthcare, diagnosis, assistance or health and social health therapy activities;
- administrative and certifying activities related to diagnosis, assistance or health and social health therapy activities;
- planning, management, control and assessment of healthcare activities;
- compliance with obligations laid down by laws, regulations and community legislation, on issues of public health as well.

The legal basis of the processing is set out in Article 6, paragraph 1, letters c) and e) of the GDPR, in the exemptions referred to in Article 9, paragraph 2, letters g) and h) of the GDPR and, lastly, in Article 2-sexies, paragraph 2, letters t) and v) of the Privacy Code as subsequently amended and supplemented.

**2. Categories of personal data**

- personal details;
- contact details;
- health and health-related;
- genetic, biological and other categories of data only if processed.



### **3. Processing methods**

Personal data is processed by means of operations indicated by Article 4, paragraph 1, no. 2 of the GDPR as: collection, registration, organisation, storage, consultation, elaboration, amendment, selection, extraction, comparison, use, interconnection, block, communication, erasure and destruction of data. The data is processed by the Data Controller through IT, electronic or paper methods, tools and procedures that are strictly necessary to accomplish the aforementioned purposes.

Lastly, specific and adequate safety measures of a technical and organisational nature, laid down by the GDPR to prevent the loss of data, unlawful or incorrect uses and authorized access (data breach), are deployed.

### **3. Access and communication of personal data**

Personal data processed solely for the abovementioned purposes may be transmitted to subjects to whom its communication is stipulated by laws or regulations, or pursuant to legal relationships underway with ASL Roma 1. In particular, it may be communicated:

- to people from each Operating Unit of the Local Health Authority authorised to its processing, who may transmit in turn to other legitimised subjects in compliance with professional secret;
- to other Local Health and Hospital Authorities for the sake of treating patients;
- to insurance companies with which users have subscribed medical aid policies aimed at the reimbursement of the medical costs incurred;
- to other public subjects (e.g. Municipality and Region) for institutional purposes (Public Health Hygiene, control of healthcare and health-related spending), to other Bodies, Universities, and Research Institutes IRCCS for research purposes based on legislative provisions and/or in the public interest;
- to family members and acquaintances only upon the data subject's express and specific indication.
- To the Judicial and/or Public Security Authority, in the cases expressly provided for by the law.

### **4. Storage period**

Personal data will be stored for the time deemed by the Local Health Authority necessary for achieving the purposes indicated under point 1 of this privacy information.

Collected data can be stored indefinitely if anonymised and thus not irreversibly traceable to the data subject.

### **5. Transfer of personal data**

The Data Controller undertakes to circumscribe the scope of circulation and processing of personal data (e.g. memorisation, archiving, and storage of data on its servers) to countries belonging to the European Union, along with the express prohibition to transfer it to non-UE countries. If this transfer becomes necessary for the purposes referred to under point 1,

ASL Roma 1 undertakes to ensure an adequate level of protection by adopting the protection tools provided for by Regulation (EU) 2016/679 - CHAPTER V, through compliance with the guidelines of the Court of Justice of the European Union, CJEU (SCHREMS I and SCHREMS II Judgment) and adoption of the Standard Contractual Clauses issued on 4 June 2021 by the EU Commission.

## **6. Data subject's rights**

Each data subject may exercise the rights set out in articles 15-22 of the GDPR, more precisely: right of access, right of rectification, right to erasure, right to restriction of processing, and right to object to the conditions and limitations provided therein.

If the data subject has exercised the right(s) and the Data Controller has failed to respond or provided an inadequate response, he has the additional right to lodge a complaint with the Personal Data Protection Authority (Article 77 of the GDPR and Article 141 of the Privacy Code) or with the Competent Judicial Authority (Article 79 of the GDPR and Article 140-bis of the Privacy Code).

## **7. How to exercise the rights**

The data subject may at any time exercise his rights by sending a registered letter with return receipt or an email, using the contact details indicated in the boxes.

### **Data Controller - ASL Roma 1**

<p><b>In the person of the legal representative pro tempore</b> <b>E-mail <a href="mailto:ufficioprivacy@aslroma1.it">ufficioprivacy@aslroma1.it</a></b> <b>PEC. <a href="mailto:protocollo@pec.aslroma1.it">protocollo@pec.aslroma1.it</a></b></p>
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### **RDP (Data Protection Officer) - Scudo Privacy S.r.l.**

<p><b>E-mail <a href="mailto:dpo@aslroma1.it">dpo@aslroma1.it</a></b> <b>PEC. <a href="mailto:scudoprivacy@legalmail.it">scudoprivacy@legalmail.it</a></b></p>
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