

Information for patients of H San Raffaele Resnati S.r.l. concerning the processing of personal data pursuant to Articles 13 and 14 Regulation (EU) 2016/679 (GDPR)

Dear Madam/ Sir,

The Data Controller (the "Data Controller"), intends to provide you, in your capacity as a data subject (the "Data Subject") with specific information on the processing of your personal data ("Personal Data") that is necessary with reference to the activities carried out within the Data Controller's healthcare facility in its various hospital or territorial articulations, pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 ("GDPR") and of the European and national legislation supplementing and/or amending it, including Legislative Decree No. 196/2003 as amended (hereinafter, "Privacy Code").

Data Controller: H San Raffaele Resnati S.r.l.

E-mail address : privacy.resnati@hsr.it

Data Protection Officer : Giorgio Presepio

E-mail address: rpd.hsrr@hsr.it

Personal data processed	
Type Data	Source
Master data	Data collected from the Data Subject or, through the exercise of the services provided by the facility, from third parties, such as, by way of example: family members of the Patient; persons legally exercising parental authority, guardianship or legal representation over the Patient; healthcare facilities or third-party specialists.
Email, Internet browsing, IT system operations	
Data revealing racial or ethnic origin	
Data revealing religious or philosophical beliefs	
Genetic data	
Health-related data	
Sex life/sexual orientation data	

Purpose of processing	Legal basis for processing	Data retention period
Purpose Prevention, diagnosis, treatment and rehabilitation activities, including diagnostic, therapeutic, laboratory, specialist outpatient, inpatient and post-discharge care services	Legal Basis Common data Performance of a task of public interest or connected with the exercise of official authority vested in the Data Controller, <i>pursuant to</i> Article 6(1)(e) of the GDPR Special data categories Purposes of health or social care diagnosis, assistance or treatment or management of health or social care systems and services on the basis of Union or Member State law or in accordance with a contract with a health professional, <i>pursuant to</i> Article 9(2)(h) of the GDPR	Storage time Timeframes established in the "Version 04" Scrapbook of the "Titolario e Massimario del Sistema Sociosanitario Lombardo, già Sistema Sanitario e Sociosanitario di Regione Lombardia", approved by Decree of the D.G. Welfare no. 15229 of 1 December 2017 and subsequent amendments and additions, adopted by Regione Lombardia that applies to the entire Lombardy Region's Sociosanitary System.
Administrative and certification activities strictly related to the achievement of the purposes of prevention, treatment, diagnosis, rehabilitation and health or social care or therapy (e.g. to manage bookings, patient acceptance, the compilation of medical records and other documentation, to manage payments, to receive reminder sms bookings, to enable the provision and operation of the queue-elimination service provided at the Company's premises)	Common data Performance of a task of public interest or connected with the exercise of official authority vested in the Data Controller, <i>pursuant to</i> Article 6(1)(e) of the GDPR Special categories of data Reasons of substantial public interest based on Union or Member State law, <i>pursuant to</i> Article 9(2)(g) of the GDPR in conjunction with Article 2-sexies of the Privacy Code	Timeframes established in the "Version 04" Scrapbook of the "Titolario e Massimario del Sistema Sociosanitario Lombardo, già Sistema Sanitario e Sociosanitario di Regione Lombardia", approved by Decree of the D.G. Welfare no. 15229 of 1 December 2017 and subsequent amendments and additions, adopted by Regione Lombardia that applies to the entire Lombardy Region's Sociosanitary System.
Fulfilment of obligations provided for by laws and regulations, as well as execution of provisions issued by the Authorities or by supervisory, control and reporting bodies (e.g. sending information to the competent bodies of the SSN and SSR, Social Security and Welfare Institutions, Insurance Companies, within the limits of the performance of their institutional task)	Common data Fulfilment of the legal obligations to which the Data Controller is subject <i>pursuant to</i> Article 6(1)(c) of the GDPR Special categories of data Relevant grounds of public interest based on Union or Member State law, <i>pursuant to</i> Article 9(2)(g) of the GDPR in conjunction with Article 2-sexies of the Privacy Code	Timeframes established in the "Version 04" Scrapbook of the "Titolario e Massimario del Sistema Sociosanitario Lombardo, già Sistema Sanitario e Sociosanitario di Regione Lombardia", approved by Decree of the D.G. Welfare no. 15229 of 1 December 2017 and subsequent amendments and additions, adopted by Regione Lombardia that applies to the entire Lombardy Region's Sociosanitary System.

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Carrying out tasks of the National Health Service and those working in the health sector, as well as tasks relating to hygiene and safety in the workplace and the safety and health of the population, civil protection, safeguarding life and limb.	Common data Performance of a task of public interest or connected with the exercise of official authority vested in the Data Controller, <i>pursuant to Article 6(1)(e) of the GDPR</i> Special categories of data Reasons of public interest in the field of public health, such as protecting against serious cross-border health threats or ensuring high standards of quality and safety of healthcare and of medicinal products and medical devices, <i>pursuant to Article 9(2)(i) of the GDPR</i>	Timeframes established in the "Version 04" Scrapbook of the "Titolario e Massimario del Sistema Sociosanitario Lombardo, già Sistema Sanitario e Sociosanitario di Regione Lombardia", approved by Decree of the D.G. Welfare no. 15229 of 1 December 2017 and subsequent amendments and additions, adopted by Regione Lombardia that applies to the entire Lombardy Region's Sociosanitary System.
Management of pharmacovigilance and adverse event reporting (reactions to therapies, drugs, reports of infectious diseases, etc.)	Common data Performance of a task of public interest or connected with the exercise of official authority vested in the Data Controller, <i>pursuant to Article 6(1)(e) of the GDPR</i> Special categories of data Reasons of public interest in the field of public health, such as protecting against serious cross-border health threats or ensuring high standards of quality and safety of healthcare and of medicinal products and medical devices, <i>pursuant to Article 9(2)(i) of the GDPR</i>	Timeframes established in the "Version 04" Scrapbook of the "Titolario e Massimario del Sistema Sociosanitario Lombardo, già Sistema Sanitario e Sociosanitario di Regione Lombardia", approved by Decree of the D.G. Welfare no. 15229 of 1 December 2017 and subsequent amendments and additions, adopted by Regione Lombardia that applies to the entire Lombardy Region's Sociosanitary System.
Handling of user complaints and reports	Common data Performance of a contract to which the data subject is party or of pre-contractual measures, <i>pursuant to Article 6(1)(b) of the GDPR</i> Special categories of data Purposes of health or social care diagnosis, assistance or treatment or management of health or social care systems and services on the basis of Union or Member State law or in accordance with a contract with a health professional, <i>pursuant to Article 9(2)(h) of the GDPR</i>	Timeframes established in the "Version 04" Scrapbook of the "Titolario e Massimario del Sistema Sociosanitario Lombardo, già Sistema Sanitario e Sociosanitario di Regione Lombardia", approved by Decree of the D.G. Welfare no. 15229 of 1 December 2017 and subsequent amendments and additions, adopted by Regione Lombardia that applies to the entire Lombardy Region's Sociosanitary System.
Any communication of patient/insured person's medical records to insurance companies limited to the subject of the insurance relationship between the person concerned and the insurance company	Common data Performance of a contract to which the data subject is party pursuant to Article 6(1)(b) of the GDPR Special categories of data Consent of the data subject, <i>pursuant to Article 9(2)(a) of the GDPR</i>	Timeframes established in the "Version 04" Scrapbook of the "Titolario e Massimario del Sistema Sociosanitario Lombardo, già Sistema Sanitario e Sociosanitario di Regione Lombardia", approved by Decree of the D.G. Welfare no. 15229 of 1 December 2017 and subsequent amendments and additions, adopted by Regione Lombardia that applies to the entire Lombardy Region's Sociosanitary System.
Communication of information on the patient's state of health or presence in the facility to third parties (e.g. family members or acquaintances) specifically indicated by the patient.	Common data Consent of the data subject, <i>pursuant to Art. 6(1)(a) of the GDPR</i> Special categories of data Consent of the data subject, <i>pursuant to Article 9(2)(a) of the GDPR</i>	Until consent withdraws by the data subject
Carrying out satisfaction surveys on the healthcare services used (so-called "customer satisfaction") and in order to improve the quality of the services themselves. The Personal Data collected through the questionnaires are destroyed or anonymized immediately after their collection.	Common data Consent of the data subject, <i>pursuant to Art. 6(1)(a) of the GDPR</i> Special categories of data Consent of the data subject pursuant to Article 9(2)(a) of the GDPR	Time strictly necessary to anonymize or destroy the data in the questionnaires, but no longer than 3 months.
Sending promotional communications and direct marketing, including the sending of newsletters, through automated means (such as SMS, email, push notifications, MMS, telephone without operator) and non-automated means (regular mail, telephone with operator).	Common data Consent of the data subject, <i>pursuant to Art. 6(1)(a) of the GDPR</i>	Until such time as the data subject withdraws consent
Establishment, exercise or defense of the Data Controller's rights, including the exercise of a debt collection action against the Data Subject	Common data Pursuit of the legitimate interest of the data controller, <i>pursuant to Article 6(1)(f) of the GDPR</i> Special categories of data Establishment, exercise and defense of a right in court <i>pursuant to Article 9(2)(f) of the GDPR</i>	For the entire duration of the litigation and/or credit recovery action, until the time limits for appeal actions have expired.
Contacting the patient by e-mail, in relation to health treatments already undertaken, also for preventive purposes to be implemented periodically, as well as for promotion and information activities of services similar to those already used.	Common data Pursuit of the legitimate interest of the data controller, pursuant to Art. 6(1)(f) of the GDPR in conjunction with Art. 130(4) of the Privacy Code.	Until such time as the patient declares that he no longer wishes to receive the described e-mails from the Data Controller. To this end, you may contact the Data Controller or the DPO by writing to the contacts listed above or you may click on the link you will find below each e-mail.

Personal Data collected for the purposes of prevention, treatment, diagnosis, rehabilitation and health or social care or therapy will be processed by or under the responsibility of a professional subject to professional secrecy or by other persons subject to the obligation of secrecy in accordance with European Union law or national law or the rules laid down by the competent national bodies, *pursuant to Article 9(3) of the GDPR*.

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Nature of data provision and consequences of refusal

The provision of the Personal Data required for health care and administrative purposes are strictly related there to the data processing indispensable; failure to do so may make it impossible for the Data Subject to access health care services. On the other hand, failure to consent to the processing of Personal Data for the other above-mentioned purposes does not prevent access to the healthcare service, but will only make it impossible for the Data Controller to carry out the relevant processing.

Treatment modalities

The processing of Personal Data will take place - in accordance with the principles of correctness, lawfulness and transparency - both in electronic or paper form manual and/or telematic supports and/or tools, with logics strictly related to the purposes of the processing and, in any case, guaranteeing the confidentiality and security of the data themselves and compliance with the specific obligations laid down by law. The availability, management, access, storage and usability of the data is guaranteed by the adoption of technical and organizational measures to ensure appropriate levels of security in accordance with Articles 25 and 32 of the GDPR, as well as in relation to the specific processing purposes identified by the applicable legislation.

Data Communication

Your Personal Data will not be disclosed except where disclosure or dissemination is required by law or by order of the authorities. In any case, these are subjects, entities or authorities acting in their capacity as autonomous Data Controllers. Furthermore, where you have given specific consent, your Personal Data will be communicated to GSDSS, which will process them in its capacity of Autonomous Data Controller for marketing purposes.

Data processor

Your Personal Data may be disclosed to service providers closely related and functional to the Data Controller's business, who typically act as data processors under Article 28 of the GDPR. The full list can be requested at any time from the Data Controller by writing to the contact details above.

Persons authorized to process

Personal Data may be processed by employees of the company functions assigned to the pursuit of the above-mentioned purposes, who have been expressly authorized to process them and who have received adequate operating instructions in accordance with the provisions of Article 29 of the GDPR.

Transfer of personal data to countries outside the European Union

It is not the Data Controller's intention to transfer your Personal Data to countries outside the European Union and the European Economic Area. Should such a transfer be necessary and/or unavoidable for the organizational needs of the Data Controller, it should be noted as of now that it will only be made to countries for which there is an adequacy decision adopted by the European Commission; in the case of a country other than the one referred to in the preceding point, the transfer of data will be governed by the Standard Contractual Clauses without prejudice to the adoption, with the prior agreement of the Parties involved, of another of the safeguard measures established by art.46 of the GDPR or the application of one of the derogatory mechanisms set out in Article 49 of the GDPR. Further information is available from the Data Controller by writing to the contact details above.

Rights of the Data Subject

In relation to the processing of your Personal Data, you may assert the rights recognized to the data subject by Art. 7 (right to withdraw consent), and by Articles 15 to 22 of the GDPR, where applicable and within the limits established by Art. 2-undecies of the Privacy Code (right of access to data, right to rectification or erasure of data, right to restrict or object to the processing of data, right to data portability, right not to be subject to automated decision-making), by submitting a request in writing to the Data Controller or to the DPO at the above-mentioned addresses. We also inform you that pursuant to Article 140-bis of the Privacy Code, you may lodge a complaint with the Personal Data Protection Authority or appeal before the Judicial Authority.

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