# PRIVACY NOTICE PURSUANT TO ARTICLES 13 ET SEQ. OF EU REGULATION 2016/679 (GDPR)

Dear User,
Since May 25th, 2018, the European Regulation on the protection of personal data has been in force. For this reason, we have prepared and updated our procedures in compliance with the regulatory framework, also updating our privacy notice so that it reflects the changes made to our systems in order to strengthen your privacy rights. This is part of our commitment to ensuring the highest level of protection in the processing of your personal data, which will be stored securely and only for the time necessary to achieve the processing purposes.
The changes introduced allow us to comply with the standards of the new General Data Protection Regulation (hereinafter referred to as "GDPR").
Thank you for your attention.

## DATA CONTROLLER

The Data Controller, pursuant to Article 4 GDPR, is COeSO Società della Salute dell'Amiata Grossetana, delle Colline Metallifere e dell'Area Grossetana (abbr. COeSO – SdS Grosseto), hereinafter referred to as the "Controller", with registered office in Via Damiano Chiesa – 58100 Grosseto, tax code 01258070539, tel. +39 0564 439210, email: info@coesoareagr.it, represented by its legal representative pro tempore.

## DATA PROTECTION OFFICER (DPO)

The Data Protection Officer (DPO) is PKF GODOLI RAS SRL, with registered office in Via Guido Reni 2/2 – 40125 Bologna (PEC: pkfgodoliras@legalmail.it), represented by Dr. Laura Maccari.

## CATEGORIES OF DATA PROCESSED

The personal data processed include:

- Data allowing direct and indirect identification (name and surname, images, tax code, telephone number, residential address);
- Special categories of data (revealing racial or ethnic origin, religious or philosophical beliefs, political opinions, trade union membership, health data, sex life, genetic data, biometric data, sexual orientation);
- Judicial data.

## PURPOSES OF PROCESSING

COeSO SdS Grosseto is a public consortium established by the municipalities of the local socio-health area and the Azienda USL Toscana Sud Est, with the objective of planning, managing and integrating local social, social-health and healthcare services pursuant to Regional Law no. 40/2005.
The consortium operates to guarantee citizenship rights and inclusion through a network of services aimed at different population groups.
In particular, COeSO provides services for: minors and families, elderly people, people with disabilities, foreign citizens, individuals in conditions of marginalization or dependency.
Activities range from parenting support and child protection to home and residential care, inclusion projects, training and promotion of individual autonomy.
COeSO pursues purposes of significant public interest, ensuring essential services for vulnerable people while promoting solidarity, participation and social reintegration. In this context, COeSO frequently processes particularly sensitive personal data necessary to respond appropriately to the needs of assisted people.
The processing purposes pursued by the Controller can be summarized as follows:

- provision of social, social-health and territorial healthcare services;
- administrative and accounting management of services;
- operational and logistical management of services;
- compliance with legal, regulatory and contractual obligations;
- assessment of service quality.

**METHODS OF PROCESSING**
Your personal data will be processed using paper, IT and electronic tools, ensuring protection against unauthorized or unlawful processing and against accidental loss, destruction or damage.
In particular, data are:

- collected exclusively for the stated purposes and processed accordingly;
- adequate, relevant and limited to what is necessary (data minimization);
- accurate and, where necessary, updated, deleted and/or rectified;
- retained no longer than necessary to achieve the purposes for which they were collected.

**LEGAL BASIS FOR PROCESSING**
Processing is lawful as it is based on at least one of the following legal grounds:

- the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller (Art. 6(1)(e) GDPR);
- reasons of substantial public interest on the basis of Union or Member State law, which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject (Art. 9(2)(g) GDPR);
- preventive or occupational medicine, diagnosis, provision of health or social care or treatment (Art. 9(2)(h) GDPR);
- compliance with a legal obligation to which the Controller is subject (Art. 6(1)(c) GDPR).

**RECIPIENTS OF PERSONAL DATA**
Your personal data may be processed in paper and electronic form, in any case adopting appropriate security measures to ensure their protection.
The processing may be carried out by:

- personnel (e.g. employees, collaborators, volunteers) specifically authorized by the Controller and periodically trained, including with regard to personal data protection;
- third parties acting as external data processors formally appointed by the Controller (such as healthcare professionals, social workers, technical staff, IT service providers);
- banks or service providers performing activities on behalf of the Controller;
- public authorities (e.g. the Revenue Agency) or other entities entitled to receive the data pursuant to laws or regulations.

**TRANSFER OF DATA TO THIRD COUNTRIES**
The Controller does not transfer personal data to third countries, international organizations, or other EU Member States. Should such transfer become necessary in the future, appropriate information will be provided.

**DATA RETENTION PERIOD**
Personal data will be retained for the time necessary to provide the service, in compliance with applicable laws, and in any case for no longer than 10 years.

**CONSEQUENCES OF FAILURE TO PROVIDE DATA**
With regard to the personal data referred to above, where processing is based on a legal obligation, regulatory provisions, or a substantial public interest necessary for the performance of the services and the pursuit of the institutional purposes described above, any refusal to provide personal data or to allow processing is generally not relevant, as the legal basis for processing prevails over the data subject's consent.
Conversely, where you decide not to provide your personal data and/or to withdraw consent for the processing of data that is optional, the establishment or continuation of the relationship may be prevented with regard to the activities based on such consent. Any services strictly related to the basic provision may still be performed where applicable.

In such cases, you will not be able to benefit from additional services provided by our organization. You have the right to withdraw your consent at any time; such withdrawal shall not affect the lawfulness of processing carried out prior to the withdrawal.

**DATA SUBJECT RIGHTS**

You may exercise the following rights at any time:

- Right to withdraw consent (Art. 7(3) GDPR): you may withdraw any consent previously given for the processing of your personal data. From the moment of withdrawal, your data will no longer be processed on the basis of consent, without affecting the lawfulness of processing carried out before the withdrawal.
- Right of access (Art. 15 GDPR): you have the right to obtain confirmation as to whether personal data concerning you are being processed and, if so, to access such data and receive information on the purposes of processing, the categories of data processed, the recipients to whom the data may be disclosed, the retention period, your rights, the source of the data (if collected from third parties), and the existence of automated decision-making processes, including profiling.
- Right to rectification (Art. 16 GDPR): you have the right to obtain the rectification of inaccurate personal data concerning you and the completion of incomplete data.
- Right to erasure (Art. 17 GDPR): you have the right to request the erasure of personal data concerning you, within the limits set by applicable law, particularly where processing is necessary for compliance with legal obligations, for reasons of public interest in the health sector, or for the establishment, exercise or defence of legal claims.
- Right to restriction of processing (Art. 18 GDPR): you have the right to obtain restriction of processing where you contest the accuracy of the data, where processing is unlawful but you oppose erasure, where the data are required for legal claims, or where you have objected to processing pending verification of overriding grounds.
- Right to data portability (Art. 20 GDPR): where applicable, you have the right to receive your personal data in a structured, commonly used and machine-readable format and to transmit those data to another controller.
- Right to lodge a complaint (Art. 77 GDPR): you have the right to lodge a complaint with the competent supervisory authority if you believe that the processing of your personal data infringes data protection law.

**AUTOMATED DECISION-MAKING, INCLUDING PROFILING**

The Controller does not use automated decision-making systems and does not carry out profiling activities, namely any form of automated processing of personal data consisting in the use of such data to evaluate personal aspects relating to an individual, in particular to analyse or predict aspects concerning professional performance, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements (Art. 22(1) GDPR).

**Grosseto, _____**

**THE DATA CONTROLLER**
**COeSO – SdS Grosseto**

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