

Attached n.1 Circular about processing personal data in health field

Dear Mr./Mrs.

According to articles 7 and 13 of the Code in the field of protections of personal data (D. Lgs 30/06/2003 n. 196)

WE INFORM YOU THAT

- a) your personal data (given by you or acquired during medical examination or scrutiny) will be used by A.S.L. n. 14 V.C.O. workers respecting current regulations and confidentiality obligation. In particular sensitive data, defined as “**personal data suitable to reveal the health status**” could be processed only after data subject’s consent, recorded in writing;
- b) **PURPOSE OF PROCESSING DATA:** these data will be used for diagnostics purposes and/or therapeutics and/or rehabilitations and/or preventives; they could be used for statistical purpose and, in anonymous basis, for epidemiological investigation and similar, with scientific research aims. Processing genetic data has particular importance for diagnostic, therapy and prevention aims. Besides genetic data could be subject matter of no-systematic processing in the field of activities linked to other medical-legal report refer to you. (asked by you or done ex officio);
- c) **MODALITIES OF THE PROCESSING:** processing data will be done through paper support and electronical instruments: access and processing data is allowed to specifically certifying staff (...) respecting current regulations in the fields of protection of personal data and with the adoption of the minimal security measures;
- d) **DATA CONFERRAL:** as prescribed by current regulation, the conferral by you of required data:
- is **compulsory** for personal and sensitive data with diagnostic, therapy, prevention and rehabilitation purpose;
 - is facultative for genetic data with diagnostic, therapy, prevention and rehabilitation purpose and medical-legal report asked by you; it is ineluctable and compulsory for medical-legal report done ex officio if this data are integral part of the documents subject of the appraisal;
 - is facultative for personal and sensitive data with scientific research purpose;
- e) **REFUSED OF PERSONAL DATA CONFERRAL:** any refusing of giving **personal identification data** by the person involved with diagnostic, therapy, prevention and rehabilitation purpose, entails **the impossibility for the Company to supply the assistance requested.**

Identification data conferral given by you or acquired during scrutiny in your favor, indeed, is a moment essential and undelayable from the assistance activity. Without your absence Company’s staff has no possibility to give you the necessary assistance, because of the possibility to commit a mistake and the subsequent injury that could derived by the lacking availability of data useful to describe a complete view of information about you;

- You, as the person involved (and so, as Legal Spokesman) has the right to oppose, for legitimate reasons, at the processing of genetic data for purposes indexed at the point d) (diagnostic, therapy and prevention purposes) [art. 90 del D. Lgs n. 196/2003], and to the processing of personal and sensitive data for research purpose. The lacking conferral of genetic data for medical-legal report ex officio can make impossible the development of this activity.

f) **DATA COMMUNICATION:** in the field of institutional activity referring to the supply of health assistance it could be possible to communicate only the health data to:

ASL (the Local Health Unit), Hospitals, National Health Service, Piedmont Region (health department), other public players, social security authorities, employers, company insurance brokerages, insurance companies, companies that do activities related to medical professions; companies that provide goods, supplies or services for A.S.L. n. 14 VCO.; credit institutes; volunteer associations; patient's relatives. Exception to this rule is made for the communication or diffusion of data, accordance with the law, from Police or Legal Court, information or security systems, to defend Nation or with the aim of the security of the Nation, or to prevent, to check or to suppress a crime. (art. 25, comma 2, D.Lgs n. 196/2003).

g) **DATA DIFFUSION:** personal data suitable to reveal health status couldn't be shared (art. 22, comma 8, and art. 26, comma 5, of D.Lgs. 196/2003).

h) **TITLE HOLDER:** the title holder is A.S.L. n. 14 VCO in the person of the General Director.

i) **RESPONSIBLE OF TREATMENT:** according to art.2, comma 1 of the Company Handbook for security and processing personal data, processing responsables are individuated in the responsables of the Company Complex Structure. To the Sector Hospital and Territorial Sanitary Directors are given functions of coordination in privacy field, in