

PRIVACY POLICY PURSUANT TO ART. 13 of Legislative Decree 196/03 (Personal Data Protection Code)

Dear Sir/Madam,

from the moment you are admitted, our facility will come into possession of both personal and health details about you.

The most effective safeguarding of our patients' privacy, besides being a precise legal obligation, is one of the main quality objectives that our facility is committed to fulfilling. We will attempt to explain to you here the methods and purposes with which your information will be processed and, for this reason, we ask you to please read these lines carefully, as it is necessary for you to provide us with informed consent to the processing of your personal data.

First of all, we wish to ensure you that all your information will be processed with maximum confidentiality, according to the principles of need, security and responsibility provided for by Legislative Decree 196/2003 concerning the protection of personal data, as well as in strict observance of professional secrecy, which binds the health and administrative staff that collaborates with us. We remind you, in this regard, that art. 7 of Legislative Decree no. 196/03 grants you specific rights regarding your personal data and we ask you to take note of them.

In particular, pursuant to art. 13 of Legislative Decree 196/03, we wish to inform you in advance on the following aspects.

NATURE OF THE DATA

The personal data acquired are basically composed of:

- identifying data such as name, address, telephone no., tax code no., age, gender, place and date of birth, etc.;
- bank and/or insurance details;
- << **Specification by the Healthcare Facility:** indicate any other types of common personal data processed>>.

Furthermore, the Data Controller may, subject to the consent of the person concerned and in compliance with the authorisation granted by the Authority in the field of processing of data concerning health and sex life, process data relative to state of health and sex life.

PURPOSES OF THE PROCESSING

The personal data acquired are processed for the following purposes:

1. Supply of services and prevention, diagnosis and treatment interventions (including follow-up activities for the purposes of care);
2. Establishment and consultation of an electronic health dossier instrumental in improving care processes;
3. Management of the administrative-accounting requirements within the necessary limits for correct accounting processing and for the payment of healthcare services (by the National Health Service and/or Insurance Companies, Associations, Agencies, Health Insurance Funds, etc.);
4. Management of connected administrative activities instrumental to the services and health services;
5. Fulfilment of specific obligations or execution of specific tasks provided for by laws, by Community legislation or by regulations, in particular concerning diagnosis and treatment, including organ and tissue transplants, rehabilitation of states of disability and physical and mental incapacity, prophylaxis of infectious and contagious diseases, prevention of occupational diseases and accidents, pharmaceutical care, in accordance with law;
6. Scientific/statistical research activity with processing of data in anonymous and aggregated form;
7. Processing for statistical-epidemiological purposes with relative follow-up for statistical and scientific knowledge purposes;
8. Commercial/promotional activities, limited to common data;
9. To enforce or defend a right, even by a third party, in court as well as during administrative proceedings and in arbitration and conciliation procedures in the cases provided for by the laws, by Community legislation, by the regulations and by collective contracts, providing that the data are processed solely for these purposes and for only as long as strictly necessary;
10. << **Specification by the Healthcare Facility:** indicate any other types of common personal data processed>>.indicate any additional purposes for which the personal data is processed>>.

Possible genetic data may be processed solely for purposes of prevention, diagnosis, treatment or to allow the person concerned to make a free and informed decision as well as for purposes of evidence in civil or criminal proceedings in accordance with law.

PROCESSING METHODS

Data collection, recording, storage and modification operations may be performed for the indicated purposes in printed, electronic and telematic format with logics closely correlated with the purposes themselves and, in any case, always in compliance with the regulations aimed at guaranteeing, among other things, data confidentiality and security.

The personal data provided will be processed in compliance with the principles of lawfulness, fairness, relevance and no surplus and shall be kept only as long as necessary to fulfil the legal obligations or the tasks necessary to achieve the purposes for which the data are processed.

Personal data are processed using paper and electronic instruments. Processing with electronic instruments takes place through IT/telematic tools organised so as to guarantee the security and confidentiality of the personal data. The data archives are protected with access codes as provided for by the regulations and by systems that prevent external intrusions and unauthorised access.

The processing will be carried out by operators of the facility, expressly appointed persons in charge of the processing, suitably instructed on the security measures to be adopted and subjected to constant supervision by the Data Controller and/or by the Data Supervisor.

Please note that possible processing of personal data may be carried out that presents specific risks for the basic rights and freedoms, as well as for the dignity of the person concerned, in the context of the purpose of telemedicine and telecare.

Some data, rendered anonymous, may be used for scientific and statistical research.

NATURE OF THE DATA CONFERMENT

Conferment of the personal data requested for the purposes indicated in the "Purposes of the processing" section is optional. We point out, however, that with reference to the purposes referred to in points 1, 3, 4, 5 and 9 of the section mentioned, in the absence of your personal data and of the relative consent to processing, and except for the cases in which Legislative Decree 196/03 allows the consent to be given at a later time, the service cannot be performed.

HEALTH DOSSIER

To improve your treatment process and thus for purposes of prevention, diagnosis, treatment and rehabilitation, it is possible, with your consent, to establish a digital health dossier documenting your health history. The personal and health details collected can thus be updated promptly and made immediately available to the Facility's medical staff, who may access this tool when treating you. Consent to the consultation of the dossier by a specific person (e.g. ward doctor) may also be referred to his/her substitute.

The lack of consent, total or partial, does not affect the possibility of having access to the required medical care.

If you consent to the establishment of the health dossier, it will always be possible for you to request the blocking of specific clinical events and thus not have a single treatment episode appear in the dossier. This possibility is guaranteed at the time the clinical event occurs and may be exercised subject to request, on your part, of the special form from the Facility's medical and/or nursing staff.

The dossier might be consulted without your consent, but in compliance with the General Authorisation of the Guarantor, only if essential to safeguard the health of a third party or of the community.

Access to the dossier will be limited to the period of time necessary to carry out the care operations for which the accessing person is qualified.

Without prejudice to the rights referred to in art. 7 of Legislative Decree 196/03, which must be respected, relative to the data processed through establishment of the health dossier, directing any requests to the Hospital Directorate c/o the Data Controller's address, we remind you that the consent to the implementation of the dossier given by you as well as the request to block some clinical events can be revoked at any time. For this purpose you may use the forms available at the Facility or send a duly signed formal request to revoke to the attention of the Medical Director c/o the Data Controller's address.

Lastly, we inform you that it is your right to consult the dossier at any time, which you will be guaranteed within the limits of acknowledgement of a summary report of the clinical events that occurred during the various hospitalisations. To this end you may present a specific request in writing addressed to the Facility's Medical Director c/o the Data Controller's address.

COMMUNICATION OF THE DATA

Data suitable for revealing state of health will be communicated directly to the person concerned or to his/her delegate with suitable means to prevent unauthorised persons from becoming privy to them.

The health data may be communicated, subject to granting of consent, within the limits strictly relevant to the obligations, tasks and purposes of the processing, to the following categories of persons who carry out activities connected with or instrumental to the performance of services and/or to the carrying out of the doctor's activities and may be known by the same persons in their capacity

as Data Controllers or Data Supervisors:

- specific third party subjects, in accordance with the provisions of the laws in force and in accordance with the provisions of the existing contractual relationships between the companies of Gruppo Villa Maria S.p.A., in order to allow fulfilment of the legal obligations and the most efficient supply of the health services requested. Thus, under the laws in force, the personal details, therapies and treatments carried out, the discharge diagnosis with the relative hospital discharge card and whatever else necessary, will be communicated, to the extent applicable, to the Local Health Authority and to the public safety authorities;
- for company requirements connected with the register of customers and for correct administrative and accounting management requirements, the personal, fiscal and health details, including the transmission of a copy of the medical records (the latter within the limits required for correct accounting processing and for the payment of the health services provided to you), will be communicated to other companies of the Gruppo Villa Maria S.p.A.;
- for the obtainment of payment for the health services provided, the personal, fiscal and health details, including a copy of the medical records, will be communicated to the appropriate bodies of the National Health Service and/or to any other agencies indicated by you (Insurance Companies, Associations, Agencies, Health Insurance Funds, etc.);
- to companies of Gruppo Villa Maria S.p.A., to the Ettore Sansavini Health Science Foundation or to National Health Service facilities for statistical and scientific investigations. In such cases the data will be communicated in anonymous and aggregated form;
- to suppliers of prostheses (e.g. heart valve, pacemaker) in order to activate the required guarantee of perfect working of the implanted device, to catering companies for the definition of personalised diets, to **providers of support and maintenance services on scientific equipment and computer systems for the sole purpose of guaranteeing adequate technical and online support on the same (e.g.: to identify and correct errors and failures and to update the systems, etc.);**
- to the Hospital's insurance company for the protection of the same and of its operators, for the theories of liability;
- to the Judicial Authority and/or to the Public Safety Authority, in the cases specifically provided for by law.
- **<< Specification by the Healthcare Facility:** indicate any additional areas of communication of the personal data processed>>.

Only the employees, collaborators and consultants previously in charge of the processing will have access to the personal data based on the purposes and methods reported beforehand.

The data suitable for revealing state of health and sex life will not be disclosed.

We thank you for your attention and ask you to please return the duly signed "Consent for the processing of personal data" form attached to this Privacy Policy; otherwise, we will not be able to provide you with the requested health services.

All information regarding your state of health will be communicated to you and to your family members only through the medical staff in charge of your treatment, or through another doctor appointed by them. For all other matters related to the safeguarding of your personal data, please contact the Facility's Data Controller or the Data Supervisor, who are at your disposal for any clarification in this regard.

DATA CONTROLLER AND DATA SUPERVISOR

Data controller Alberto Di Perna in the person of his legal representative with headquarters on Via Di Roncrio, 25 Bologna.

The Data Supervisor is <<identification, where appointed, of the Data Supervisor through indication of the role/function held in the hospital>>.

RIGHTS OF THE PERSON CONCERNED

Pursuant to art. 7 of the Privacy Code, it will be possible to present at any time request for access to the processed data, obtain confirmation of the existence or not of the same data and know its content and origin, verify its accuracy or request its integration, updating or rectification.

Pursuant to the same article, it will be possible to request the deletion, transformation into anonymous form or blocking of the data processed in violation of the law, as well as to oppose its processing in any case for legitimate reasons.

To this end it will be possible to contact the Data Controller using the personal details provided below:

Clinica Privata Villalba, in the person of their legal representative with headquarters in Bologna, Via Di Roncrio, 25.

Bologna, 13 February 2013

The Chief Executive Officer
Dr. Alberto Di Perna