

## INFORMATION ON THE PROCESSING OF PERSONAL DATA

Dear Sir/Madam,

the General Data Protection Regulation EU/2016/679 (hereinafter also referred to as "GDPR") and the Privacy Code (Italian Legislative Decree 196/03), as amended by Italian Legislative Decree 101/18, shall provide that the processing of personal data of natural persons is carried out in accordance with the fundamental rights and freedoms of the individual.

Personal data is information about an identified or identifiable natural person.

The processing of personal data is any operation or set of operations - carried out either by electronic means or on paper - applied to personal data.

Personal data relating to the health of a natural person deserve special attention and compliance with regulatory constraints.

The processing of personal and health-related data by the National Institute for Infectious Diseases "Lazzaro Spallanzani" (hereinafter also referred to as "Spallanzani" or "Institute") is based on the principles of lawfulness, correctness, transparency, accuracy, integrity and confidentiality, and is not excessive in relation to the specific, explicit and legitimate purposes for which the data is collected.

### **Data controller**

The Data Controller is the National Institute for Infectious Diseases "Lazzaro Spallanzani", the Scientific Institute for Research, Hospitalisation and Health Care, with registered office in Rome, via Portuense, No. 292 (Post Code 00149) (hereinafter also referred to as "Data Controller").

The Acting General Manager of the Institute is Mr. Francesco Vaia.

The contact details of the Data Controller are as follows:

06/55.17.05.25 - [inmi@pec.inmi.it](mailto:inmi@pec.inmi.it).

The Institute has appointed a Data Protection Officer (hereinafter also referred to as "DPO").

You can contact the DPO at the following e-mail address: [dpo@inmi.it](mailto:dpo@inmi.it).

### **Purpose, method and legal basis of personal data processing**

Your personal data (e.g. name, surname, contact details) will be collected when you book the rapid antigenic test specifically for SARS-CoV-2 or the molecular test specifically for SARS-CoV-2; the data relating to the methods of payment, and in particular payments via electronic money, shall be processed for the purposes of pursuing the legitimate interest of the data controller in collecting the amounts due in respect of the healthcare services provided to the parties concerned, and in order to justify the legitimacy of the payment in their favour of the sums paid by the parties concerned, in the event of any dispute. Data concerning your health will be processed when the antigenic test is performed in one of the prefabricated booths set up at the "Leonardo da Vinci" International Airport of Fiumicino, or when the molecular test is carried out at the Institute's laboratory.

This data will be processed exclusively for diagnostic and public health purposes and for the fulfilment of administrative and accounting tasks related to the performance of the Data Controller's activities.

The legal basis for the processing of your data is to carry out the processing in order to comply with a legal obligation to which the data controller is subject, according to Article 6(1)(c) of the GDPR, to carry out a diagnosis on your behalf and for reasons of public interest in the field of public health, such as the protection against serious cross-border threats to health, according to Article 9(2)(i) of the GDPR.

### **Recipients of Personal Data**

Your data will be processed by authorised persons working for the data controller who are bound by professional secrecy or contractually subject to the duty of confidentiality imposed by the data controller and duly instructed by the latter.

The paper documents in which your data will be stored will be kept by the Institute using an outsourced filing service supervised by the data controller.

Data in electronic form will be stored in the Institute's Data Centre.

The data collected through the computer systems is protected by special security criteria to prevent undue access or theft.

Your data may be processed by external companies previously appointed as "external data controllers" pursuant to Article 28 of the GDPR, in order to carry out specific operations necessary to guarantee the Institute's services.

In particular, your ordinary data (first name, last name, passport-ID number, fiscal code, sex, date of birth, residence, e-mail, mobile phone number, flight number, date and destination) may be collected by ADR as personal data processor in accordance with art. 28 of the General Data Protection Regulation 2016/679 (GDPR) in order to carry out the activities of *i)* reception and registration of the user at the areas set up for the provision of the tests, *ii)* online booking service for the tests; *iii)* daily sending of users list (name, surname and email address) to National Institute for Infectious Diseases for billing and service management.

Your data will be stored by ADR only for the time necessary to provide the above-mentioned services (48 hours after the date for which the test is booked online or at the airport, also in order to allow passengers on flights with a time difference to use the booking service).

ADR and ADR Group staff are in no way involved in the management of the association process between the user who carries out the test for the SARS-CoV-2 virus and the corresponding result, as they do not in any case come into contact with data suitable for revealing information relating to the state of health of users (i.e. positive and/or negative) and/or with special categories of personal data (art. 9 GDPR).

Your data will be communicated to independent data controllers to whom INMI is obliged by law to transmit them for the purposes of reporting and notifying a positive case of an infectious disease, such as Public Health Authorities, Ministry of Finance and Lazio Region. Your data will also be made available to the banks with which the data controller has opened the current account on which the electronic money payments will be made, also in order to justify the legitimacy of the payment in favour of the sums paid by the interested parties, in the event of disputes.

Your data may be disclosed to a non-member country. The data controller shall transfer the data in compliance with the conditions set out in Chapter V of the GDPR, in order to ensure that the level of protection of natural persons guaranteed by the Regulation is not undermined.

#### **Period of data retention**

The data collected will be kept for the time provided for by current legislation.

#### **Rights of the data subject**

As a data subject, you may exercise the rights provided for in Articles 15 to 22 of the GDPR with the Data Controller, i.e. the right of access, rectification, erasure - albeit in compliance with legal obligations requiring the Institute not to erase personal data collected in medical records -, restriction, objection, and portability.

You may also file a complaint with Supervisory Authority for the Protection of Personal Data.

The procedures for exercising these rights can be explained to you by the Public Relations Office, located in the Institute's hall, from Monday to Friday, 9am to 12.30pm. Tel. 0655170245, E-mail [urp@inmi.it](mailto:urp@inmi.it).

There is no automated decision-making process at the Institute, including profiling.

All personal data processed by the owner concerning you may never be disclosed.

## **THE DATA CONTROLLER**

**General Manager Mr Francesco Vaia**