

PERSONAL DATA PROCESSING POLICY

given to the data subject pursuant to Article 13 of the EU Regulation 2016/679 - HCV Screening Data Collection System

In accordance with the provisions of the European Data Protection Regulation 2016/679, Legislative Decree. 30 June, 2003, no. 196 and Legislative Decree 10 August 2018, No. 101 (the "GDPR" and "Privacy Code," respectively), the purpose of which is to protect the fundamental rights and freedoms of natural persons, in particular the right to the protection of personal data, you need to review information which will help you understand the reasons for which your personal data will be processed, explaining what your rights are and how to exercise them.

1. Purposes of personal data processing

This information sheet is given to those intending to take the free HCV *screening* test who agree to have their data entered on the Regional platform for monitoring the *screening* campaign and, if found positive for the first-level test, to the reporting of data to the specialist centre. The campaign aims to achieve the goals indicated by the World Health Organization implemented in Italy by the Ministry of Health through a decree-law indicating the Autonomous Regions and Provinces as implementing entities.

Your personal data have been collected by ATS, ASST, IRCSS, Accredited Laboratories, Autonomous Data Controllers acting in their capacity as the parties in charge of performing *screening* activities.

The personal data referable to you (hereinafter also "Data") collected and used in this context are as follows:

- (i) your personal details (i.e., first name, last name, gender, date of birth, tax ID or STP code);
- (ii) your contact information (i.e., telephone number and e-mail address);
- (iii) your special data related to the specific screening treatment (i.e., eligibility, date of test administration, type of test, date of result availability, outcome);
- (iv) your special data referring to the care pathway of a specialist centre (i.e., date of contact for the second level test, outcome of contact, date and outcome of appointment for the second level test, acceptance of the care pathway, eligibility for administration of therapy, outcome acceptance of eradicating therapy, outcome of therapy), only in case the outcome of the test is positive.

Your Data, referred to in (i), (ii), (iii) are processed so as to allow monitoring by Regione Lombardia of the progress of the regional *screening* program *and* to extract aggregated and anonymized summary *reports*, i.e., to calculate statistical indicators in accordance with ministerial indications (without any transfer of personal data). If the test result is negative, all your data will be deleted at the end of the screening campaign.

Your Data, referred to in point (iv) are processed in order to enable the provision of the second level screening test and any subsequent care pathway offered by the Lombardy region.

Participation in the screening campaign and provision of the Data referred to in (i), (ii), (iii) and (iv) above is absolutely voluntary.

Your personal data will be processed by the Controller for the above purposes in accordance with Art. 6, para. 1(a) and Art. 9, par. 2 (a) "the data subject has given his or her explicit consent to the processing of such personal data for one or more specific purposes") of the GDPR. The purposes of Data processing and the related condition of lawfulness are related to the fulfilment of obligations assigned to Regione Lombardia within the national HCV screening program.

2. Data processing methods

The processing will be carried out with the aid of electronic or otherwise automated means, in accordance with the principles of necessity and minimization under Art. 5, par. sub-paragraph 1(c) of the GDPR, and therefore only for the time strictly required to achieve the purposes pursued. The Data Controller adopts appropriate technical and organisational measures to ensure a level of security appropriate to the type of data processed.

3 Data Controller

Data Controller pursuant to art. 4 par. 7 of the GDPR is Regione Lombardia (Tax ID. 80050050154, VAT No. 12874720159), with head office in Piazza Città di Lombardia 1, 20124 Milan (MI), Italy ("**Regione Lombardia**" or the "**Data Controller**").

4. The Lombardy Region Data Protection Officer (DPO)

can be contacted by sending an e-mail to the following e-mail address rpd@regione.lombardia.it.

5. Communication and dissemination of personal data

Your data will be processed exclusively by the data controller, the appointed data processors, such as Aria S.p.A., a company for innovation and procurement of the Lombardy Region, as well as any additional specially appointed suppliers and relevant staff specially trained in data processing and protection in order to ensure the same level of security offered by the data controller.

Personal data will never be disclosed to third parties except in fulfilment of any legal obligations. Regione Lombardia will develop and share only statistical indicators (after anonymization and subsequent aggregation) of screening campaign progress with the Ministry of Health to fulfil its legal obligations.

The data will in no way be disseminated.

6. Transfer of personal data to countries outside the European Union

Data collected and processed are not transferred to companies or other entities outside the EU.

7. Data storage times

We inform you that your personal data will be kept, in accordance with the principles of necessity and purpose of processing, only and exclusively for the period of:

- (I) 12 months after sending the screening program;
- (II) anonymized and aggregated summary data, which are useful for calculating the indicators required by the Ministry, while no longer personal in nature, will be retained for an additional six months to ensure possible further study.
- (III) The data referred to in 1 (iv), should you test positive for the screening test and decide to continue with the care pathway, will be retained until the end of the period of the care pathway by the second level specialist centre.

Lastly, your personal data will be kept only for the duration of the campaign in order to ensure the verification of statistical information (thus aggregated and computed anonymously) for the calculation of the screening campaign progress indicators and to ensure the health authorities that the clinical evaluation of the program is correct.

The processing required to calculate these indicators consists of full anonymization and subsequent aggregation.

8. Data subject's rights

Pursuant to Articles 15-22 of the GDPR, you may exercise the following rights:

- . right of access to the data, making appropriate request for the following information: purposes and methods of processing; categories of personal data in question; recipients or categories of recipients to whom the personal data have been or will be communicated; period of data retention; logic applied to the processing; identification details of the data controller and data processors;
- right to request rectification or supplementation of data;

- right to request deletion (in the cases provided for by the Regulations), transformation into anonymous form of data and blocking of data if processed in violation of the law, without prejudice to all storage obligations imposed by law;

- right to request portability of processed data;
- right to request restriction of processing (in cases provided for by the Regulations).

You also have the right to revoke consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to withdrawal.

You also have the right to lodge a complaint with a Supervisory authority;

Requests to exercise your rights should be sent to the attention of the relevant Division. General Welfare Division-Prevention Office at the e-mail address welfare@pec.regione.lombardia.it or by registered mail to the address Piazza Città di Lombardia 1, 20124 Milan, Italy.

IN ACKNOWLEDGEMENT WHEREOF

€ I declare that I **have read** the privacy policy and **freely and knowingly give my consent to the processing of data** for inclusion in the regional platform for monitoring the *screening* campaign.