



Siena University Hospital

General information for the processing of the users' personal data

(articles 13-14, EU Regulation n. 2016/679 – GDPR)



Dear user,

This information sheet, which can also be consulted on the institutional website www.ao-siena.toscana.it under the “Privacy” section, is meant to inform You about the processing of the personal data necessary in order to carry out the institutional activities, including the provisioning and the management of the requested health services.



DATA CONTROLLER

Siena University Hospital (Azienda ospedaliero-universitaria Senese)
Strada delle Scotte 14, Siena
E-mail: ao-siena@postacert.toscana.it



DATA PROTECTION MANAGER (RPD/DPO)

E-mail: privacy@ao-siena.toscana.it



WHAT WE DO WITH YOUR DATA (Data categories, Necessary requirement)

Processing of personal data is discussed about each operation carried out on personal data.

We request and process “common” personal data, such as Your name, last name, date of birth, personal contacts, or other identification data and “particular” data, such as the data concerning your health. The provision of your personal data is necessary to be able to make use of the services provided by the Siena University Hospital.



WHY DO WE TREAT YOUR DATA (Purposes, Legal base)

We treat your data for the performance of institutional functions such as **diagnosis, care, and rehabilitation**. In these fields we also offer tele-assistance, telemedicine and second opinion services. In addition to these functions, we deal with hygiene and public health, pharmaceutical assistance, the provisioning of integrated care paths that involve other public or private healthcare subjects/facilities, in particular, in the context of the South-East Wide Area (*Area Vasta Sud-Est*), didactic activities and of professional training, social-administrative accounting activities linked to the pursuit of the aforementioned institutional purposes, including the quality evaluation and the control of the services provided; the respect of the pre-contractual, contractual, legal obligations; service communications, the management of complaints and finally we deal with the requests that are forwarded to us. Moreover, we investigate the satisfaction of the user, but in such a way that ensures anonymity of the user's personal data. We treat your data also for public functions under the competence of the University Hospital, such as the provision of goods and services to the user for health safeguard; certification activity; the fulfilment of legal obligations such as civic, fiscal, accounting, administrative and safety management rules, the surveillance and the compilation of mortality registers, of tumours and other pathologies, as well as the activity of video-surveillance to protect the heritage and people. As University-Hospital, we also carry out scientific and medical research, but, where necessary, we acquire the free and explicit consensus of the interested person. However, where possible, the treatments take place anonymously. For all these activities, except for specific hypotheses, it is not necessary to request Your consent, since the treatments are always strictly linked to prevention, diagnosis, assistance, health therapy and to relevant public interest. Your personal data, even if gathered by a specific operating unit can be used by the Data Controller also for the needs of other sectors, as long as the treatment is connected to the pursuit of institutional purposes.



WHEN DO WE ASK FOR YOUR CONSENT (Optional activities as compared to the previous ones)

Differently, your consent is required when the data processing concerns purposes considered important for the University Hospital but that don't fall within the institutional functions envisaged by national regulations, for which specific documentation is required, namely:

1. To communicate your health status to your family or acquaintances or your trusted physician;
2. To provide the via web Reporting service;
3. For Scientific Research and statistical purposes, including research and clinical trials, pharmacovigilance and epidemiological studies, in compliance with the laws, regulations and opinions of the Ethical Committee;

In order to realise an **Electronic Health Dossier**, which is the set of your personal data originating from present and past clinical events, which are shared among the healthcare professionals who assist You at our facility, with the purpose of improving the diagnoses and the treatment paths while respecting Your privacy.



HOW WE PROCESS YOUR DATA AND BY MEANS OF WHAT (Processing modes)



We process your personal data at the various facilities in paper and digital format also using audio and video/photographic tools. We adopt all technical and organisational measures in order to avoid problems such as unauthorised access, disclosure, modification, or destruction. For some processing we also use the Cloud, but with data centres located in Italy exclusively. Only personnel authorised by the Owner can access to carry out operations of processing or maintenance of the systems. No automatic decision systems are utilised, including the profiling.



WHERE AND TO WHOM YOUR DATA END UP (Categories of recipients)

Several treatments are computerised and, in some cases, it is possible that your personal data are communicated to companies that carry out these activities on our behalf, however appointed as External Managers and instructed to process data in conditions of maximum security. Your personal data is communicated to other public bodies in respect of the obligations established by laws and regulations, such as to social security bodies, to the Judicial Authority, to other Health Trusts or to the Municipality or Region of belonging. They will never be distributed. Your data, in case of transfer to third countries that are not part of the European Union, will be protected with appropriate measures of security and only to countries adopting regulations of personal data protection in line with the Regulation. Persons hospitalised at facilities of the University-Hospital or accessing the First Aid department have the right: to communicate information on the health status only to the subjects identified by them; to not warn third parties about their presence in the department.



FOR HOW LONG DO WE STORE YOUR DATA (Storing period)

National storage regulations establish that Your personal data will continue to be stored for as long as necessary in order to pursue the aforementioned purposes and for the time envisaged by the medical record. The data is stored for the time established by current legislation; in particular, the data concerning each hospitalisation episode, collected in its medical record, will be kept for an indefinite period.



FROM WHO WE RECEIVE YOUR DATA (Data source)

Where possible we collect personal data directly from the interested Subject, however, if Their health conditions do not allow this, we turn to who legally exercises Their representation (in the case of minors, once the legal age is reached, the consent of the Interested subject will be acquired again) or to a close relative, family member, co-habitant, or civil partner, or, to a fiduciary to art. 41. 219/2017. In their absence, accordingly to the best measures to safeguard the rights and freedoms of the Interested subject, we contact the head of the facility where the Interested subject status or the physician designated by the latter, appointed to treat Their personal data appropriate to the reveal the state of health.



WHAT ARE YOUR RIGHTS

You can request directly to the Data Controller to see, correct, cancel or limit the data we process and that concern you. In some cases, you can also oppose or withdraw your consent to the treatment; you also have the right to data portability, hence, you can request at any time a digital copy of the data or the automatic transfer among public bodies.



HOW CAN YOU EXERCISE YOUR RIGHTS

In order to exercise the rights as the EU Regulation 2016/679, you can send a request to the Head of the Protection of Personal Data, whose contact details are provided above, using the appropriate form retrievable from the Privacy section ("Forms at the use of Interested parties") of the University Hospital website and available at the Public Relations Office (URP). Our Data Protection Officer (RPD/DPO) will analyse your request and, if necessary, will contact you for further information. You also have the right to file a complaint to the Guarantor Authority for the Protection of Personal Data.



UPDATES

The information sheet is the tool provided by the Regulation to apply the principle of transparency and foster the management of the information that we process and that concern you. As the methods of processing of the national or European legislation vary, the Information sheet may be revised and integrated.