



Lingua Inglese PRIVACY NOTICE APPLICABLE TO CHATBOT ALGHO

Pursuant to articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter, “**GDPR**”), l’Azienda ospedaliero universitaria Senese (hereinafter, “**AOUS**”) as independent data controller (hereinafter, “**Data Controller**”), hereby informs you of the methods and purposes with which it will process your personal data through the messaging service “**ChatBot ALGHO**” developed and activated at the address <https://www.aosiena.toscana.it/> (hereinafter, the “**Service**”), in relation to the provision of a chatbot, i.e. a software designed to interact with a human.

The Service simulates a conversation between humans through intelligent software: conversations carried out through the Service are in any case reviewed by natural persons in order to be able to verify that the Service has actually provided the correct answer or to take over the conversation in the event of malfunctions of the Service.

In particular, by continuing reading you will be able to delve deeper into the following topics:

1. What categories of personal data are processed?
2. With what tools are data collected and processed?
3. On what legal basis and for what purposes are the data processed?
4. How to contact the Data Protection Officer?
5. Which parties may become aware of the data?
6. How long is the data stored?
7. What are my rights?
8. How can I exercise my rights?

1. What categories of personal data are processed?

When you use the Service, the Data Controller collects and processes the data that you will communicate for the purposes of implementing and improving the Service. The Data Controller suggests not to enter data of a particular nature in the chat (art.9 of EU Regulation 2016/679) and the Personal Data that the Data Controller may incidentally become aware of through the Service will be processed in accordance with the following conditions.

Data generated by access to the site

The computer systems and software procedures used to operate ALGHO acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This data (such as domain names, IP addresses, operating system used, type of device and browser used for the connection) is not accompanied by any additional personal information and is used to:

- I) obtain anonymous statistical information on the use of the platform;
- II) manage needs to control the ways in which it is used;
- III) ascertain responsibility in the event of hypothetical computer crimes.



The legal basis that legitimises the processing of such data is the need to make the functions of **ALGHO** usable following the user's access.

Data provided voluntarily by the user

Personal information, which includes the name, surname, email address and information indicated in conversations with the system or any other identifier to contact the interested party online or offline or any other information that can be directly or indirectly attributed to the interested party and that will be provided by the interested party himself through the platform **ALGHO** will be used in the presence of specific consent (expressed through the use of the chat), for the management of responses to the interested parties regarding navigation assistance.

Technologies that **QuestIT** and third parties providing content and applications may use for this automatic data collection include:

- **COOKIES.** A cookie is a small file placed on your computer's hard drive. You may refuse to accept cookies by configuring your browser accordingly. However, if you select this setting you may not be able to access some of the services of the platform **ALGHO** or websites operated by **QuestIT**. Unless you have adjusted your browser setting so that it will refuse cookies, our system may issue cookies when you use the platform **ALGHO** or websites operated by **QuestIT**. In your browser, you can disable the storage of cookies or remove registered cookies, but this may result in a reduction in functionality, a slowdown or the inability to use some parts of the platform **ALGHO** or pages operated by **QuestIT**.

As a further guarantee to the user, **QuestIT** confirms that the cookies released for the use of the service are internal to the website **AOUS** and not external and that, therefore, no transfers of personal data outside the EU are foreseen. For further information on cookies and on how to delete them based on the type of browser used, refer to: www.allaboutcookies.org.

2. With what tools are data collected and processed?

The Data Controller processes your Personal Data when you access the Service and during conversations carried out through the Service. In relation to the purposes indicated below, the processing of Personal Data occurs through manual, computerized and telematic tools with logic strictly related to the purposes themselves and, in any case, in a way that guarantees the security and confidentiality of the data themselves.

3. On what legal basis and for what purposes are the data processed?

The Data Controller processes your Personal Data for purposes strictly connected or instrumental to provide assistance to users through the Service on the basis of your explicit consent expressed by accessing the chat. Your Personal Data, specifically, will be processed to provide assistance service.

4. How to contact the Data Protection Officer?

The Data Protection Officer (hereinafter also “**RPD**” or “**DPO – Data Protection Officer**”) can be contacted at the following email address: privacy@ao-siena.toscana.it.

5. Which parties may become aware of the data?

Your personal data may be communicated to companies (QuestIT S.R.L ed aziende partner), which carry out these activities on our behalf, however appointed External Managers and trained to process the data with maximum



security. Your personal data will be communicated to other public bodies in compliance with the obligations set forth by laws and regulations.

6. How long is the data stored?

The Data Controller and the Data Processor keep a record of the conversations recorded through the Service for a period not exceeding 12 months. After this period of time, the recorded conversations will be permanently deleted.

7. What are my rights?

We inform you that, as a data subject, you can exercise specific data protection rights, listed below:

- a) **right of access:** right to obtain from the Data Controller confirmation as to whether or not Personal Data is being processed and, where that is the case, to obtain access to the Personal Data and detailed information regarding the origin, purposes, categories of data processed, recipients of communication and/or transfer of data and more;
- b) **right of rectification:** right to obtain from the Data Controller the rectification of inaccurate Personal Data without undue delay, as well as the integration of incomplete Personal Data, also by providing an additional declaration;
- c) **right to erasure ("right to be forgotten"):** right to obtain from the Data Controller the deletion of Personal Data without unjustified delay in the event that:
 - i. the Personal Data are no longer necessary for the purposes of the processing;
 - ii. the consent on which the processing is based is revoked and there is no other legal basis for the processing;
 - iii. the Personal Data has been processed unlawfully;
 - iv. Personal Data must be erased to comply with a legal obligation;
- d) **right to object to processing:** right to object at any time to the processing of Personal Data which has as its legal basis a legitimate interest of the Owner and/or to the processing for marketing purposes, including profiling. In case of objection to the processing for marketing, the Personal Data will no longer be processed for such purposes;
- e) **right to restriction of processing:** right to obtain from the Data Controller the limitation of processing, in cases where the accuracy of the Personal Data is contested (for the period necessary for the Data Controller to verify the accuracy of such Personal Data), if the processing is unlawful and/or the interested party has opposed the processing;
- f) **right to data portability:** right to receive Personal Data in a structured, commonly used and machine-readable format and to transmit such data to another Data Controller if technically feasible, only for cases in which the processing is based on consent or on the contract and only for data processed by electronic means;
- g) **right to lodge a complaint with a supervisory authority:** Without prejudice to any other administrative or judicial remedy, the data subject who considers that the processing of personal data relating to him or her infringes the Regulation has the right to lodge a complaint with the supervisory authority of the Member State in which he or she habitually resides or works, or of the State in which the alleged infringement occurred.

8. How can I exercise my rights?

To exercise your rights, you can forward your request to the email address privacy@ao-siena.toscana.it. The Data Controller will provide information regarding the action taken on your request without undue delay and at the latest within one month of receiving it.



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GLOSSARY ON PERSONAL DATA PROTECTION

Authority for the protection of personal data: independent administrative authority established by Law No. 675 of 31 December 1996 responsible for monitoring compliance with data protection legislation.

Personal data: pursuant to art. 4, paragraph 1, no. 1, it is "*any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.*"

Regulation: EU Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and which repeals Directive 95/46/EC.

Data Protection Officer (DPO): figure introduced by the Regulation, whose main tasks include informing and providing advice to the Data Controller, Data Processors and Persons in Charge regarding data protection; monitoring compliance with the Regulation; providing opinions on the data protection impact assessment; cooperating with the supervisory authority.

Data Controller: pursuant to art. 4, paragraph 1, no. 7 of the Regulation, this means the "*natural or legal person, public authority, service or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data [...].*"

Processing of personal data: pursuant to art. 4, paragraph 1, no. 2 of the Regulation, it is "*any operation or set of operations, performed with or without the aid of automated processes and applied to personal data or sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.*"