


<p>Sistema Socio Sanitario</p>  <p>Regione Lombardia ASST Valcamonica</p>	<p align="center"><b>Information on personal data processing pursuant to Article 13 General Data Protection Regulation 2016/679 (GDPR)</b></p> <p align="center">MANAGEMENT OF CLAIMS</p>	<p align="center"><b>M GPD 036</b> <b>Rev. 00</b> <b>Page 1 of 4</b> 13.02.2026</p>
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Dear Sir/Madam,

Pursuant to Article 13 of the General Data Protection Regulation 2016/679 (hereinafter the GDPR), which sets out provisions regarding the processing of personal data, we hereby inform you that **ASST Valcamonica**, in its capacity as Data Controller, will process a range of information concerning you which you have provided in writing or verbally and freely communicated, classified as “personal data” or “special categories of data” under the GDPR. The regulation stipulates that anyone processing personal data is required to inform the data subject of which data is being processed and of certain elements characterising the processing, which must in all cases be carried out lawfully, fairly and transparently, safeguarding your privacy and guaranteeing your rights. This notice is therefore provided in relation to the processing of your personal data for the management of claims held by this ASST in connection with the services provided. We therefore provide you with the following information.

#### **A) Purposes and legal basis of the processing**

The processing of your personal data, and any special categories of data, will be based on the principles of fairness, lawfulness and transparency, safeguarding and preserving your privacy and your rights.

Below are the main purposes for the processing of your personal data:

- 1)
  - entry into company registers and computer databases;
  - management of receivables within the context of public law relationships:
    - unpaid healthcare co-payments;
    - fees for healthcare services provided to foreign nationals;
    - fees for healthcare services provided under the intramural private practice scheme;
    - fees for assignments arising from agreements/arrangements with other bodies (e.g. teaching, consultancy, etc.);
    - receivables for legal costs awarded against third parties by judgement in civil, criminal, administrative and accounting proceedings;
    - receivables owed to employees or their heirs in cases provided for by national collective bargaining agreements or internal regulations;
  - management of receivables within the context of private law relationships:
    - fees for leases or concessions;
    - receivables for the supply of goods or services;
  - reporting to bodies to which the law grants powers of monitoring and control over the ASST Valcamonica.

2) You have the right to authorise the Data Controller, subject to your express and explicit consent, to process your personal data, including those belonging to special categories as referred to in Article 9 of EU Regulation 2016/679, so that such data may be transmitted by the Data Controller to the insurance company you have indicated, for the purpose of recovering claims relating to healthcare services provided. The lawfulness of the processing of personal data for this specific purpose is based on the free, express and explicit consent you have provided pursuant to Article 6(1)(a) and 9(2)(a) of EU Regulation 2016/679.

Below the grounds for the lawfulness of the processing of your personal data are listed:

- the processing is necessary for the performance of a contract to which you are a party or for the implementation of pre-contractual measures taken at your request pursuant to Article 6(1)(b) of the GDPR;
- processing is necessary for compliance with a legal obligation and/or to comply with orders from public authorities pursuant to Article 6(1)(c) of the GDPR;
- processing is necessary for the establishment, exercise or defence of legal claims or whenever judicial authorities are exercising their judicial functions in accordance with Article 9(2)(f) of the GDPR;
- the processing involving the transfer of your data to the insurance company for the purpose of recovering debts relating to healthcare services provided takes place following the obtaining of specific consent to the processing of data, in accordance with Article 6(1)(a) and Article 9(2)(a) of the GDPR.

#### **B) Types of data processed**

For the purposes set out above, your personal identification data will be processed, such as your first name, surname, tax code, place and date of birth, residence, contact details for traceability, IBAN, and special categories of data referred to in Article 9 of the GDPR relating to the service received.


Form/ASST

**AZIENDA SOCIO-SANITARIA TERRITORIALE DELLA VALCAMONICA**

**Registered office: Breno (Bs) - Via Nissolina, 2 - tel. 0364.3291 - fax**

**0364.329310 - Tax code/VAT no. 03775830981**

**www.asst-valcamonica.it Certified e-mail: protocollo@pec.asst-valcamonica.it**

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### C) Methods of processing

Your data, which may also be collected from third parties, may be processed both on paper and electronically, by telephone and via electronic means, including through automated tools designed to store, manage and transmit such data; in all cases, this will be done in compliance with all precautionary measures ensuring the confidentiality, security and protection of the information, in accordance with Articles 25 and 32 of the GDPR.

All relevant operations, carried out solely by staff duly trained and authorised by the Data Controller or their delegate, will be conducted in accordance with professional secrecy and confidentiality, and the principles of fairness, lawfulness, transparency and data minimisation, in compliance with the security measures prescribed by current legislation, and the processing will be carried out by personnel duly trained, appointed and authorised by the Company in accordance with the provisions of the GDPR.

The processing will be carried out in such a way as to minimise the risk of destruction or loss, unauthorised access, or processing that does not comply with the purposes for which the data were collected.

Personal data are processed:

- in accordance with the principle of data minimisation, pursuant to Article 5(1)(c) and Article 25(2) of the GDPR;
- lawfully and fairly.

Personal data are collected:

- for specific, explicit and legitimate purposes;
- accurate and, where necessary, kept up to date;
- relevant, complete and not excessive in relation to the purposes of the processing.

### D) Disclosure

Your personal data will not be disclosed in any way (this term meaning making it known in any manner to an unspecified number of parties), subject to legal obligations, and will not be transferred to third countries or international organisations; however, should it be necessary, in accordance with current legislation, they may be communicated (this term meaning making them known to one or more specific parties) to:

- parties whose right of access to the data is recognised by provisions of law, secondary legislation, EU legislation, and collective bargaining agreements;
- staff, employees and consultants of ASST Valcamonica, within the scope of their duties and/or any contractual obligations, including Data Processors appointed in accordance with the GDPR;
- suppliers, including data processors designated in accordance with Article 28 of the GDPR, acting on behalf of ASST Valcamonica in the manner and for the purposes outlined above;
- post offices, freight forwarders and couriers for the dispatch of documentation and/or materials;
- banks for the management of collections and payments arising from the performance of contracts;
- only upon the provision of specific and express consent, the insurance company indicated by you.

Should the need arise to disclose data to third parties not expressly indicated, your specific and express consent will be requested.

### E) Provision of data

The provision of data is mandatory for the purposes set out in section A), point 1) of this policy. Failure to provide such data will result in the failure to provide the requested service, its proper performance and the fulfilment of any legal obligations.

The processing of personal data for the purposes set out in section A), point 2) of this policy (the sending of personal data, including data belonging to special categories of data as referred to in Article 9 of the GDPR, to the specified insurance company) is optional. Failure to provide consent will prevent the Data Controller from sending the documentation at the direct request of the insurance company, which will therefore have to obtain the documentation directly from you.

### F) Data retention

Your personal data will be retained for no longer than is strictly necessary to fulfil the purposes for which they were collected, subject to retention for legal obligations.

Details regarding retention periods for each category of data are available from the Company upon request by the data subject, by contacting the Data Protection Officer (DPO).

### G) Data Controller


Form/ASST

**AZIENDA SOCIO-SANITARIA TERRITORIALE DELLA VALCAMONICA**

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The Data controller is ASST Valcamonica, with registered office at Via Nissolina 2, 25043 Breno (BS).

#### H) Data Protection Officer

The Data Protection Officer (DPO), appointed by the Data Controller pursuant to Article 37 of the GDPR, is:

Legal entity

LTA S.r.l. Via della Conciliazione 10, 00193 Rome VAT no. 14243311009

Natural person

Annamaria Taini, Lawyer

#### I) Who to contact to exercise your rights

You may contact the Data Protection Officer (DPO) by registered post (25043 Breno (BS), via Nissolina n. 2), via certified e-mail (protocollo@pec.asst-valcamonica.it), or via e-mail (rpd@asst-valcamonica.it) to exercise your rights, as set out in Articles 15 et seq. of the GDPR, including in particular:

- **the right of access:** to know the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipients to whom the personal data are intended or will be disclosed, in particular if recipients are in third countries or international organisations, where possible, the envisaged period for which the personal data will be stored or, if this is not possible, the criteria used to determine that period; where the data are not collected from the data subject, the right to obtain all available information regarding their origin;
- **the right to rectification:** that is, the right to obtain from the Data Controller, where this does not conflict with current data retention legislation, the rectification without undue delay of your inaccurate personal data. In relation to the purposes of the processing, you have the right to have your incomplete personal data completed, including by providing a supplementary statement;
- **the right to erasure:** if the data are no longer necessary, provided this does not conflict with current legislation on data retention; you have withdrawn your previously given consent or object to a specific processing operation; the Company has a legal obligation to erase data concerning you; the data collected have been processed unlawfully;
- **the right to restriction of processing:** where you consider that the data concerning you held by the Company is incorrect and you wish to verify its accuracy; where you consider that your consent has not been validly given and, rather than requesting the Company to erase the data, you prefer to specify the limits within which it may be used; where you wish to prevent its erasure because you need to exercise a right in court; when you have objected to the processing pending verification as to whether the Company's legitimate grounds for continuing the processing prevail;
- **the right to object to processing:** You have the right to object to the processing of your data for reasons relating to your particular situation; in such cases, where processing is necessary for the performance of a task carried out in the public interest, to comply with a legal obligation imposed on the Company, or where processing is necessary for the pursuit of a legitimate interest of the Company, the Company will assess your request to determine the extent to which it can be accommodated;
- **the right to withdraw consent:** at any time without affecting the lawfulness of processing based on consent prior to your withdrawal;
- **the right to lodge a complaint with a supervisory authority:** You may lodge a complaint with the Data Protection Authority to report a breach of data protection regulations and to request an investigation by the authority.

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**CONSENT FORM****HAVING READ THE INFORMATION PROVIDED TO ME**

pursuant to Article 13 of the General Data Protection Regulation 2016/679 (GDPR)

I, the undersigned, \_\_\_\_\_  
(please tick the relevant box: patient/parent/guardian/curator/support administrator)

born in \_\_\_\_\_ on \_\_\_\_/\_\_\_\_/\_\_\_\_

residing at \_\_\_\_\_, Street \_\_\_\_\_

telephone \_\_\_\_\_ e-mail \_\_\_\_\_

ID document no. \_\_\_\_\_ issued by \_\_\_\_\_ on \_\_\_\_\_

Document certifying role no. \_\_\_\_\_ issued by \_\_\_\_\_ on \_\_\_\_\_  
(for guardian/curator/support administrator)

**hereby authorise** ASST Valcamonica to process my personal data for the purposes set out in section A), point 2) of the Privacy Notice, namely the transmission of personal data, including special categories of data as referred to in Article 9 of the GDPR, to the specified insurance company, for the purposes of recovering debts relating to healthcare services provided.

**do not authorise** ASST Valcamonica to process my personal data/special categories of personal data for the purposes set out in section A), point 2) of the Privacy Notice, namely the transfer of personal data, including sensitive personal data as referred to in Article 9 of the GDPR, to the specified insurance company, for the purpose of recovering debts relating to healthcare services provided.

Date \_\_\_\_/\_\_\_\_/\_\_\_\_ Signature \_\_\_\_\_

I, the undersigned, \_\_\_\_\_

**HEREBY WITHDRAWS THE CONSENT PREVIOUSLY GIVEN**

Signature \_\_\_\_\_

Date \_\_\_\_/\_\_\_\_/\_\_\_\_

