

Information on the processing of personal data pursuant to Articles 13-14 of EU Regulation 2016/679

Owner and data collected

Dr. Cecilia Iacono, registered with the Order of Psychologists (Ordine degli Psicologi) under number 11923, as Data Controller of your personal data, pursuant to and for the purposes of EU Regulation 2016/679 (hereinafter 'GDPR'), hereby informs you that the aforementioned regulation provides for the protection of data subjects with respect to the processing of personal data and that such processing will be based on the principles of fairness, lawfulness, transparency, and protection of your privacy and your rights.

Your personal data, indicated below, will be processed in accordance with the legislative provisions of the aforementioned regulation and the confidentiality obligations set forth therein:

a. Personal, contact, and payment information – information relating to your name, telephone number, PEO and PEC address, as well as information relating to payment of the fee for the assignment (e.g., credit/debit card number), etc.

Legal basis for processing: performance of contractual/pre-contractual obligations (Article 6(b) GDPR). Providing your data is mandatory for the proper performance of the task.

b. data relating to health status: personal data relating to our/my physical or mental health are collected directly in relation to the request for assessments, examinations, diagnostic tests, rehabilitation interventions and any other type of professional service connected with the performance of the assignment.

Prerequisite for processing: provision of a healthcare service (Article 9, paragraph 2, letter h). Providing data is mandatory for the proper performance of the assignment.

Purpose of processing

Your data will be processed for the following purposes:

- to carry out activities necessary for prevention, diagnosis, treatment, rehabilitation or for other services requested by you, connected to the execution of the assigned task
- to manage relationships with the patient (session bookings, etc.)
- to manage functional relationships aimed at carrying out the healthcare services and/or the requested professional assignment
- to fulfill legal, accounting and/or tax obligations.

The service and, consequently, the personal data processed will be performed in full compliance with the Professional Code of Ethics.

The processing of data necessary to fulfill these obligations is necessary for the proper management of the assignment and their mandatory provision is required for the purposes indicated above. The Data Controller also declares that failure to provide, or incorrect provision of, any of the mandatory information may make it impossible for the Data Controller to ensure the appropriateness of the processing.

The consent given for the processing of your data for the aforementioned purposes can always be revoked.

Treatment methods

Your personal data may be processed in the following ways:

- processing by means of computer archives;
- processing by means of paper archives.

All processing is carried out in compliance with the procedures set forth in Articles 6 and 32 of the GDPR and through the adoption of the appropriate security measures required. Your data will be processed only by personnel expressly authorized and duly trained and instructed by the Data Controller.

Your data will not be subject to automated decision-making processes.

Communication

Your personal data may be disclosed exclusively to the Health Authorities, the Judicial Authority, the Professional Association and, if necessary, for the performance of the requested services, to competent and duly appointed/trained persons, subject to guarantees of confidentiality and protection of the data subject's rights.

The data may be disclosed to other public and/or private entities exclusively to fulfill the processing purposes indicated above. In all other cases, any disclosure of your personal data will only occur upon your explicit written request.

Unless otherwise specified, the accounting information relating to healthcare expenses will be transmitted to the Revenue Agency via the electronic flow of the Health Card System for the purpose of processing the pre-filled Form 730/UNICO. This information will also be accessible to any persons for whom you are fiscally dependent (spouse, parents, etc.).

Opposition to sending the data (to be made by clicking on the item at the bottom of this document) does not affect the deduction of the expense, but rather simply means that the invoice will not be automatically included in the pre-filled tax return.

Health data (which falls within the "special category of data" pursuant to Article 9 of the GDPR) will generally be disclosed only to the interested party and only with express written authorization to third parties.

All appropriate measures will be taken to prevent unauthorized access by third parties, including those present at the time of the data transfer. Where required by law, the data may be shared with Italian National Health Service (SSN) facilities/services/operators or other public authorities.

Your personal data may be stored on servers located in EU Member States or in third countries that offer adequate security guarantees based on an adequacy decision by the European Commission (Article 45 GDPR).

Diffusion

Except as stated in the "Communication" section, your personal data will not be disclosed in any way.

Retention period

We inform you that, in compliance with the principles of lawfulness, purpose limitation, and data minimization, pursuant to Article 5 of the GDPR, the retention period for your personal data is:

- 10 years in compliance with the legal obligations established by the civil code;
- With exclusive reference to sensitive data, the latter will be retained only for the time necessary to carry out the professional assignment assigned, for purposes related to it and in any case for a minimum period of 5 years pursuant to art. 17 of the Code of Ethics of Italian Psychologists.

Personal data that is no longer necessary, or for which there is no longer a legal basis for its retention, will be irreversibly anonymized or securely deleted. You have the right to obtain from the data controller the erasure (right to be forgotten), restriction, updating, rectification, portability, and objection to the processing of your personal data. You may also exercise all the rights provided for in Articles 15, 16, 17, 18, 19, 20, 21, and 22 of the GDPR. In this case, the professional will be responsible for verifying the legitimacy of the requests and will generally respond within 30 days.

Rights of the interested party

EU Regulation 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22

- 1) The interested party has the right to obtain confirmation of the existence or otherwise of personal data concerning him or her, even if not yet recorded, and communication of such data in an intelligible form.
- 2) The interested party has the right to obtain information on:
 - a. of the origin of the personal data;
 - b. the purposes and methods of the processing;
 - c. of the logic applied in case of processing carried out with the aid of electronic instruments;
 - d. of the identifying details of the owner, the managers and the designated representative pursuant to Article 5, paragraph 2;
 - e. the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them in their capacity as designated representatives in the territory of the State, managers, or persons in charge.
- 3) The interested party has the right to obtain:
 - a. the updating, rectification, or, where applicable, integration of the data;
 - b. the deletion, anonymization, or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data was collected or subsequently processed;
 - c. certification that the operations referred to in letters a) and b) have been brought to the attention, including with regard to their content, of those to whom the data were communicated or disseminated, except in the case in which such fulfillment proves impossible or involves the use of means manifestly disproportionate to the right protected;
 - d. data portability.
 - e. the limitation of processing within the limits and in the manner established by art. 18 GDPR.
- 4) The interested party has the right to object, in whole or in part:
 - a. for legitimate reasons, to the processing of personal data concerning you, even if pertinent to the purpose of the collection;
 - b. to the processing of personal data concerning him/her for the purpose of sending advertising or direct sales materials or for carrying out market research or commercial communications.
 - c. to the processing of personal data for profiling purposes.

Dr. Cecilia Iacono
Counselor, Psychologist, Psychotherapist in training

5) Where consent is the legal basis for processing, the data subject has the right to withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

For any complaints or reports regarding data processing methods, it is best to contact the Data Controller. However, you can forward your complaints or reports to the Data Protection Authority using the relevant contact details: Garante per la protezione dei dati personali - Piazza di Montecitorio n.121 - 00186 ROME - Fax: (+39) 06.696773785 - Telephone: (+39) 06.696771 PEO: garante@gpdp.it - PEC: protocollo@pec.gpdp.it.

Having seen and understood all of the above, the undersigned

Name _____ Surname _____

born in _____ on _____

(C.F. _____)

resident in _____ in street _____

Tel: _____ Email: _____

declares that he/she has read this information on the processing of personal data.

With reference to the sending of personal, contact and payment data to the Revenue Agency via electronic flow on the Health Card System, for the purposes of the pre-filled tax return

☐ HE/SHE OPPOSES

Having received specific information, you express your free consent (by ticking the box below) to the processing of your personal data relating to your health status for the purposes indicated in this information and for which your consent constitutes the legal basis of the processing.

☐ GIVES CONSENT ☐ DOES NOT GIVE CONSENT

Place and date _____

The interested party _____

The Owner _____