

The IRCCS Azienda Ospedaliero-Universitaria di Bologna Policlinico di Sant'Orsola (hereinafter IRCCS AOU BO) informs the interested parties of the purposes and methods of processing their personal data.

This processing is carried out in compliance with Regulation (EU) 2016/679 (hereinafter GDPR), Legislative Decree 196/2003 and subsequent amendments (hereinafter Privacy Code), and other applicable regulatory provisions.

The object of the processing is "common" data (e.g., personal data) and "special" data pursuant to Article 9, paragraph 1 of the GDPR, specifically health-related data, including biological samples.

The data is processed for the institutional purposes of the IRCCS AOU BO, namely healthcare, administrative, scientific research, training, and related activities.

All data are processed by IRCCS AOU BO personnel who are bound by professional and official secrecy, according to the principles of lawfulness, fairness, and minimization with respect to the purposes for which it is collected.

### PURPOSE AND LEGAL BASIS OF THE PROCESSING OF PERSONAL DATA

The personal data indicated above are processed exclusively for purposes related to the performance of institutional activities, provided under the National Health Service or under a freelance intramural regime.

Generally, the processing of personal data does not require the data subject's consent. Processing operations performed without the data subject's consent include those:

- related to the protection of individual and collective health and psycho-physical integrity, including all activities strictly connected to the care and management, even in conjunction with other public or private healthcare providers, of the interested party's treatment pathway [healthcare purposes set out in art. 9, paragraph 2, letter h) and paragraph 3 of the GDPR];
- functional to the performance of administrative obligations (including the management of complaints/reports/litigation/debt collection (judicial and extrajudicial)), management, accounting, connected to the provision of healthcare services and benefits, as well as to the planning, evaluation and control of healthcare [administrative, institutional purposes provided for by art. 6, paragraph 1, letters c), d), e) and art. 9, paragraph 2, letters f) and g) of the GDPR, by art. 2-sexies, paragraph 2, letters s), t), u), v), z) of the Privacy Code and by Regional Regulation no. 1 of 30 May 2014];
- functional to scientific research activities (including epidemiological and statistical activities) [scientific research purposes provided for by Articles 110 and 110-bis of the Privacy Code];
- functional to the performance of educational and professional training activities (in the event that it is necessary to use your images, specific consent will be required as described in more detail below) [educational and educational purposes set out in art. 6, paragraph 1, letters c), e) of the GDPR];
- aimed at institutional communication on activities, services, events, initiatives, health promotion campaigns, IRCCS projects, scientific dissemination, support for institutional activities (fundraising, promotion of the 5x1000 tax allocation) [public interest task provided for by art. 6, paragraph 1, letter e) of Regulation (EU) 2016/679].

Some of the processing activities listed above, presenting particularly specific characteristics, are accompanied by specific dedicated information available on the institutional website of the IRCCS AOU BO in the "Privacy policy and personal data protection" section.

Otherwise, in cases expressly provided for by applicable law, in addition to the specific information, specific and explicit consent may be required, pursuant to Art. 6, paragraph 1, letter a) and Art. 9, paragraph 2, letter a) of the GDPR. Processing operations requiring the data subject's consent include those aimed at:

- creation of the Electronic Health Record;
- consultation of the Electronic Health Record by healthcare professionals;
- use of identifying images, audio, or video for training, scientific communication, or dissemination purposes, including through publication on institutional channels.

STATE	DATE	SIGNATURE
Approval	07/05/2026	Chiara Gibertoni – General Manager
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- access to online reports;

Consent is free, specific, informed, and revocable at any time, without prejudice to access to healthcare services.

### DATA PROCESSING METHODS

Personal data is processed by employees and other individuals who collaborate with the IRCCS AOU BO (e.g., medical residents and interns), in compliance with the fundamental principles set forth in the GDPR, as well as the data subject's fundamental rights and freedoms, with particular regard to confidentiality and the protection of personal data. Such personnel are specifically authorized to process data and operate based on specific instructions issued by the Data Controller, which define operational methods and security measures to be adopted.

The IRCCS AOU BO may also engage third parties to carry out activities related to its institutional functions. These parties are designated Data Processors, pursuant to Art. 28 of the GDPR, and operate in accordance with the instructions provided by the Data Controller, which can be found on the IRCCS AOU BO institutional website in the "Privacy Policy and Personal Data Protection" section.

Personal data may be processed on paper and/or using IT tools, including telemedicine or teleassistance systems, interoperable information systems between healthcare facilities that allow data consultation by authorized healthcare professionals, as well as audio-video methods.

To pursue its institutional goals, the IRCCS AOU BO may utilize systems based on Artificial Intelligence technologies, used exclusively to support the activities of healthcare professionals, in compliance with current legislation (GDPR, Law No. 132/2025) and the principles of transparency, human oversight, and algorithmic non-discrimination set forth by the Italian Data Protection Authority. These systems do not replace the clinical judgment of the physician, who remains responsible for the assessments and decisions made, nor do they result in exclusively automated decisions. In all cases where the use of AI tools is envisaged, specific information is available on the IRCCS AOU BO institutional website in the "Privacy Policy and Personal Data Protection" section.

As part of training and educational activities, data processing may also take place through the use of clinical material, in compliance with the principles of data minimization and confidentiality, anonymizing or pseudonymizing the data.

Data may be transferred to entities in other countries, including those outside the European Union, when required by law or when necessary to fulfill contractual obligations. Any transfers to non-EU countries or international organizations will be carried out in compliance with the GDPR, based on adequacy decisions by the European Commission, or through the implementation of the appropriate safeguards required by the GDPR (e.g., standard contractual clauses, consent to data transfer).

### DATA RETENTION PERIODS

The data will be retained for the time necessary to achieve the purposes for which they were collected.

Furthermore, the IRCCS AOU BO is required by law to retain documents pertaining to the purposes listed above. In such cases, they will be retained in accordance with the provisions of the Company Disposal Plan (T01/PA40) published on the IRCCS AOU BO institutional website in the "Privacy Policy and Personal Data Protection" section.

For example the data:

- relating to each hospitalisation episode, collected in the relevant medical record, are subject to unlimited retention;
- relating to outpatient services are retained for 10 years.

### DISCLOSURE OF DATA

Health data are not subject to disclosure (i.e. they cannot be disclosed to an indeterminate number of individuals). Personal data may be disclosed, in the cases provided for by applicable law, to public or private entities authorized to receive them when necessary for the provision of healthcare services, to perform institutional functions related to healthcare, to fulfill legal obligations or requests from competent authorities, or to exercise or defend legal claims, including in the context of any disputes.

The data may also be disclosed to authorized data processors who collaborate with the IRCCS AOU BO, as well as to designated data processors pursuant to art. 28 of the GDPR.

Patients hospitalized at the IRCCS AOU BO facilities or accessing the Emergency Room may request that information about their health be communicated exclusively to those they indicate and that their presence in the ward not be disclosed to third parties.

#### DATA SUBJECT'S RIGHTS

The data subject has the right to know how their data are processed and to exercise the rights provided for by data protection legislation at any time. Specifically, they may exercise the rights set forth in Articles 15, 16, 17, 18, and 21 of the GDPR. Specifically, they have the right to obtain access to their personal data, request rectification or completion if inaccurate or incomplete, erasure where permitted by law, restriction of processing, and to object to processing where permitted by applicable law. Where processing is based on consent, the data subject also has the right to withdraw it at any time.

The procedures for exercising these rights are available on the institutional website's "Privacy policy and personal data protection" page, in the "Data Subject's rights" section.

The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) or the supervisory authority of the European Union Member State in which he or she habitually resides, works, or in which the alleged infringement occurred, pursuant to Article 77 of the GDPR.

#### CONTACTS

The **Data Controller** is the IRCCS Azienda Ospedaliero-Universitaria di Bologna Policlinico di Sant'Orsola, with registered office at Via Albertoni n. 15, 40138 Bologna, telephone: 051 214 1220, PEC: [PEldirezione.generale@pec.aosp.bo.it](mailto:PEldirezione.generale@pec.aosp.bo.it)

The **Data Protection Officer (DPO)** can be contacted at the following email address: [dpo@aosp.bo.it](mailto:dpo@aosp.bo.it) or certified email: [dpo@pec.aosp.bo.it](mailto:dpo@pec.aosp.bo.it)

Any further information regarding the processing of personal data by the IRCCS AOU BO is available on the institutional website in the "Privacy Policy and Personal Data Protection" section, accessible at the link: <https://www.aosp.bo.it/it/content/policy-privacy-e-protezione-del-dato-personale>