

## Information to members provided pursuant to EU Regulation 2016/679 and Legislative Decree 196/2003 as amended by Legislative Decree 101/2018 and subsequent modifications and additions

In compliance with the regulations regarding personal data protection, Fasi, in its capacity as Data Controller, pursuant to the provisions of Articles 13 and 14 of EU Regulation 679/2016 wishes to provide you with information regarding:

- the purposes of and methods used in processing your personal data;
- the scope of communication and possible dissemination of the same;
- the nature of the data collected and their provision.

Since it is in Fasi's primary interest to protect and guarantee your right to the protection and confidentiality of the common and special personal data that you must provide to enable refunds for supplementary health care services, we inform you that our use of your personal data will be based on the principles of correctness, lawfulness and transparency in light of our obligations and compliance with the above-mentioned regulations, to protect your confidentiality and your rights.

The purpose of the Fasi - Supplementary Health Care Fund - is to provide currently employed or retired managers meeting the statutory requirements with refunds for services to supplement the care provided by the Italian National Health Service, also extending these to their families.

To achieve its purpose the Fund requires certain personal data regarding you, as a member of the Fund, who claims refunds for services and, if applicable, regarding your family members who are also covered.



### 1- Data Controller

The Data Controller is Fondo assistenza sanitaria integrativa (Fasi) - Via Vicenza 23, 00185 Roma, in the person of its President *pro tempore*.



### 2- Data Protection Officer

The Fund has appointed a Data Protection Officer (DPO), who can be contacted by email at [dpo@fasi.it](mailto:dpo@fasi.it).



### 3- Purpose and legal basis of processing

The common and special data provided by you and any changes you may communicate in the future to Fasi, in its capacity as Data Controller, will be processed for the following purposes:

	Purpose	Legal bases
1.	<u>To proceed with the registration</u> of your membership and of the relevant eligible persons, handling your personal details for administrative purposes and related support. In accordance with the provisions of article 6 paragraph 1 letter b) of EU Regulation 679/2016, the processing of data is lawful to the extent that it is necessary for the performance of a contract to which the data subject is a party.	Common data: <u>performance of a contract to which the data subject is party</u> , art. 6 para. 1 lett. b) GDPR. Special data: <u>explicit consent</u> , art. 9 para. 2 lett. b) GDPR.

	Purpose	Legal bases
2.	a) <u>To manage and process refund claims</u> , also with the assistance of the Fasi services provider, for healthcare services that you and your family members, through you, submit via the online portal or the specific printed form	Common data: <u>performance of a contract to which the data subject is party</u> , art. 6 para.1 lett. b) GDPR. Special data: <u>explicit consent</u> , art. 9 para. 2 lett. b) GDPR.
	b) <u>To provide the protections and services set out in the Nomenclature</u> : acquiring, analysing and managing the Client's data (including through the Contact Centre service) in order to verify his/her requisites for access to the protections for non self-sufficiency.	Common data: <u>performance of a contract to which the data subject is party</u> , art. 6 para.1 lett. b) GDPR. Special data: <u>explicit consent</u> , art. 9 para. 2 lett. b) GDPR.
3.	<u>Institutional communications</u> to members such as, for example, regarding changes to the Fasi Statute, Regulations and Nomenclature-Fee Schedule, the implementation of new services;	Common data: <u>performance of a contract to which the data subject is party</u> , art. 6 para.1 lett. b) GDPR.
4.	To send newsletters and/or periodic communications regarding news and events (e.g. new projects and initiatives, video interviews, questionnaires and surveys on new projects, etc.).	Common data: <u>explicit consent</u> , art. 6 para.1 lett. b) GDPR.
5.	<u>To perform out checks aimed at preventing fraud and other illegal activities</u> to the detriment of the Fund and its members and their families.	Common data: the pursuit of the <u>legitimate interest of the data controller</u> , art. 6 para.1 lett. f) GDPR. Special data: processing is necessary to <u>establish, exercise or defend legal claims</u> , or whenever the judicial authorities exercise their judicial functions, Art. 9 para. 2 letter f) of the GDPR.
6.	<u>To perform statistical analyses in support of planning, programming and control processes.</u>	Common data: the pursuit of the <u>legitimate interest of the data controller</u> , art. 6 para.1 lett. f) GDPR. Special data: processing carried out, within the scope of its legitimate activities and with the appropriate safeguards, by a <u>non-profit organisation with a trade union aim</u> , provided that the processing relates only to

	Purpose	Legal bases
		persons who have regular contact with the organisation in connection with its purposes, Art. 9 para. 2 letter d) of the GDPR.
7.	<u>Telephone support</u> to clients for the management of administrative and refund files.	Common data: <u>performance of a contract to which the data subject is party</u> , art. 6 para. 1 lett. b) GDPR. Special data: <u>explicit consent</u> , art. 9 para. 2 lett. b) GDPR.
8.	<u>To acquire data on a one-off basis from a limited set of images of tax documents for training Artificial Intelligence (AI) to extract information, using a Language Model (LM), from healthcare invoices sent via the Fasi App and attached to refund requests<sup>(*)</sup>.</u>	Common data: the pursuit of the <u>legitimate interest of the data controller</u> , art. 6 para. 1 lett. f) GDPR. Special data: processing carried out, within the scope of its legitimate activities and with the appropriate safeguards, by a <u>non-profit organisation with a trade union aim</u> , provided that the processing relates only to persons who have regular contact with the organisation in connection with its purposes, Art. 9 para. 2 letter d) of the <u>GDPR</u> .
9.	<u>To enable the use of telemedicine services</u> reserved for Clients through an authorised healthcare facility that owns a telemedicine platform, available via app and web.	Common data: <u>performance of a contract to which the data subject is party</u> , art. 6 para. 1 lett. b) GDPR.

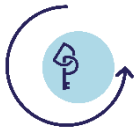


#### 4- Categories of data processed

Personal data processed are of both a common and special nature:

- common data: surname and first name, date of birth, residence, abode, tax code, contact details, title of membership; bank details; company or former company belonged to; type of any pension received; IP address; surname and first name, type of family relationship, sex, place and date of birth of family members covered by the Fund;
- special data: health-related data suitable for detecting the state of health (medical certificates and any other medical documentation submitted) and data relating to the member's trade union membership.

(\*) Please note that the acquisition of data present in healthcare invoices sent via the Fasi app and attached to refund requests ended on 26/05/2025.



### 5- Method of processing

Your personal data are processed using manual and/or computerised and/or devices using an organisational and processing logic strictly related to the stated purposes and, in all cases, in such a way as to guarantee the security, integrity and confidentiality of the data itself in compliance with the organisational, physical and logical measures required by current regulations and in order to minimise the risk of their destruction, loss, modification, unauthorised access and unauthorised disclosure. The personal data processed via the app are the same as those described at point 4 of this policy (categories and types of data processed) and are processed for the same purposes. Uninstalling or deactivating the app from the device does not constitute deletion of the Member's account or the deletion of the personal data processed, which remain available to Fasi in accordance with the provisions of the Policy.



### 6- Storage period

Personal data will be stored in full compliance with the security measures provided for by personal data protection legislation. They will be stored for the entire duration of Fund membership and also after the termination of membership, for the time needed to fulfil all applicable legal obligations and/or administrative requirements connected with or deriving from the membership.



### 7- Recipients of personal data and Data Processors

Your personal data will only be made accessible to those, within Fasi, who need it for the duty they perform or the hierarchical position they hold and who are specifically authorised by the Data Controller.

In order to carry out its activities, Fasi also needs to communicate certain client data to trusted external companies or individuals who may use it, also in their capacity as data processors, to carry out procedures that are needed to provide the services requested, or to carry out activities to support the operation and organisation of the office work needed for refund procedures in general.

Common and special personal data, so far as they relate to their respective remit, are communicated to the following parties:

1. the service company used by Fund to manage enrolments and the settlement of claims and related support;
2. the IT and medical services companies, as well as other companies providing collateral services, used by this Fund;
3. banks that are required to process payment of the amount due for the service;
4. companies managing computerised postal services;
5. the Fund's medical, legal, fiscal, accounting, actuarial and tax consultants;
6. individuals/organisations for whom the right to access your data is recognised by law (e.g. inland revenue, judicial bodies).
7. The ASSIDAI Supplementary Healthcare Fund for refund requests involving a supplement from the fund itself;
8. heirs.

A detailed list of Data Processors, if required, may be requested directly from the Data Controller.

Additionally, if you have given a mandate and/or authorisation to a third-party organisation to manage and process refund requests for healthcare services that you or your family members have received, Fasi will process the data provided by these organisations, together with those already in its possession, to issue the above-mentioned refund should the relevant conditions apply.

It is therefore understood that Fasi does not and cannot assume any liability for any data breaches by the above-mentioned organisations, which should be solely ascribed to the third party organisation authorised by you.

The data provided are not disseminated.



## 8- Transfer outside the EU

Your personal data will not be transferred by Fasi to any countries outside the EU. Should any such need arise, this will be done pursuant to Articles 44 et seq. of EU Regulation 2016/679.



## 9- Rights of the data subject

Pursuant to Articles 15 et seq. of the GDPR, in your capacity as data subject, you will have:



**Right of access**, which gives you the opportunity to:

1. obtain confirmation of the existence or otherwise of personal data relating to you, even if not yet recorded;
2. obtain information on:
  - a) the origin of the personal data;
  - b) the purposes and methods of processing;
  - c) the logic applied should processing be performed with the aid of telematic devices;
  - d) the identity of the data controller, of the data processors and of the representative designated pursuant to Art. 3, paragraph 1, GDPR;
  - e) parties or categories of parties to whom the personal data may be communicated or who may become aware of it in their capacity as designated representatives of data processors or appointees.



**Right of rectification**, which gives you the possibility to update or rectify your personal data if you feel they are not up-to-date or sufficiently accurate.



**Right to be forgotten**, which gives you the possibility to ask for your data to be deleted. With regard to this, Fasi clarifies that data will be deleted when the conditions are met as set out in art.17 comma 1 lett. a): "personal data are no longer necessary for the purposes for which they were collected or otherwise processed", and that the Fund will no longer be subject to the obligations set out in the subsequent para 3 letters b): "fulfilment of legal obligations" and (e) "defence in court".



**Right of restriction**, which enables you to request that your personal data be marked to restrict their future processing; the data should therefore become inaccessible and no longer able to be processed.



**Right to data portability**, which enables you to request data that relates to you in a structured, commonly used and machine-readable format, or the direct transmission of the data to a new Data Controller if technically feasible.



**Right of objection**, which enables you to object, wholly or in part and for legitimate reasons, to the processing of personal data relating to you, even if they are relevant to the purpose of collection.

We inform you that operations of updating, rectification, restriction, and deletion will be brought to the attention, also as regards their contents, of those to whom the data was communicated or disseminated, unless this requirement proves impossible or involves a clearly disproportionate use of resources in relation to the right being protected.

You may assert your rights under Articles 15 to 22 of the GDPR, as detailed above, by contacting the Data Controller by email at [dpo@fasi.it](mailto:dpo@fasi.it).



### 10- Complaints

Furthermore, Fasi informs you that you have the right to make a complaint to the Data Protection Authority according to the procedure described at [www.gpdp.it](http://www.gpdp.it).

Please ask your family members to read the Policy provided in accordance with EU Regulation 2016/679, available on the website at the following link

<https://dirigenti.fasi.it/en/modulistica/informativa-resa-ai-sensi-del-regolamento-ue-2016-679/>

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