Information on the processing of personal data

1. Premise

The EU Regulation 2016/679 on the "protection of individuals with regard to *the processing of personal data and on the free movement of such data" (hereinafter "EU Reg. 2016/679" or "GDPR")* contains a series of rules aimed at ensuring that the processing of personal data is carried out in compliance with the fundamental rights and freedoms of individuals.

Pursuant to art. 13 and 14 of the GDPR, Previass II — Cassa Interaziendale di Assistenza per le Aziende Clienti del Gruppo Willis Italia S.p.A. (hereinafter "Cassa"), with registered office in Turin, Via Alfieri 11, C.F 97552610012 is the Data Controller and is required to provide information regarding the processing of the personal data of its Individuals assisted and their family members who are beneficiaries of the services.

2. **Categories of personal data and source of data**

The Personal Data that Cassa processes includes, by way of example, personal data (name, surname, tax code, residential address) and special categories of data pursuant to art. 9 of the GDPR too (e.g., data suitable for revealing the state of health of the data subject).

The Data of the *Data Subjects* in the possession of the Cassa are normally collected through the Employer Company, occasionally directly from the *Data Subject*, or they may be acquired by third parties (e.g., doctors, affiliated nursing homes, affiliated health network providers, external suppliers of the Cassa, etc.) in execution of the Association's tasks and roles.

In the execution of its activities and functions, Cassa may come into possession of data that the Law defines as "special categories of data", i.e., those data from which the state of health can be deduced, among other things, and whose processing is subject to a specific expression of consent by the Member. In this case, the acquisition of special categories of data is preceded by the acknowledgment of the information and the acquisition of explicit consent from the interested Party.

3. **Purpose of the processing and legal basis**

The data collected will be processed for the following purposes:

a) Benefit from the services rendered by the Cassa, depending on the Company's registration with the Cassa, as well as carry out the ordinary activities related to the provision of services by the Cassa, aimed at providing the Assisted Persons and their family members who have become beneficiaries with supplementary and/or improved services to those provided by the National Health Service in the event of illness, accidents and health prevention activities, through the granting of financial disbursements to the Clients, both in the form of contracted assistance and through reimbursement both in the form of insurance and in the form of mutual insurance. In this case, Cassa may also process data falling within the "special categories" referred to in art. 9 of the GDPR, with reference to data suitable for revealing the state of health.

b) Benefit from the services rendered by the Cassa, depending on the Company's registration with the Cassa, as well as carry out the ordinary activities related to the provision of services by Cassa, aimed at providing Beneficiaries of Benefits in the event of death, permanent disability, permanent disability due to illness, accident, Long Term care, dread desease. In this case, Cassa may also process data falling within the "special categories" referred to in art. 9 of the GDPR, with reference to data suitable for revealing the state of health.

c) Purposes related to the necessary performance of administrative, accounting, fiscal, patrimonial, statistical-actuarial activities, and the institutional functioning of the Cassa.

d) Purposes of study, scientific research, and verification of the quality of the service.

e) Sending communications and information material relating to promotional initiatives limited to the activities of the Cassa, carried out both with traditional (paper mail, operator calls) and automated (e-mail, SMS, mms, automated calls) contact methods.

The legal basis for the processing is:

1. For the purposes referred *to in subparagraphs a*) and b):
   - For ordinary data, from the execution of the association contract signed by the Company, in particular statutes and association regulations relating to the Cassa.
   - For special categories of data (e.g., those suitable for revealing the state of health) by the explicit consent given by the *Data Subject* in relation to the association contract to which he or she is a Party.
2. For the purposes referred to *in point* c), the fulfilment of legal obligations.
3. For the purposes referred *to in subparagraphs* d) and e), by the consent given by the *Data Subject*.

The provision of the data of the *Data Subject,* as well as their communication to the categories of subjects indicated in paragraph 6, is not mandatory, but any refusal of the *Data Subject* to provide his/her ordinary data and/or to give consent to the processing of special categories of personal data will make it objectively impossible for Cassa to provide the services related to the adhesion made by the Company and/or to be able to comply with the legal obligations inherent in the operation of the Cassa itself.

On the contrary, it is understood that the refusal of the interested Party to give consent to the processing for the purposes referred to *in subparagraphs* d) and e) will not allow the Cassa to pursue only the purposes indicated therein but will not affect the provision of services.

4. **Processing methods**

The processing of personal data is carried out using manual, computers and telematic tools with logics strictly related to the purposes and, in any case, in such a way as to guarantee the security and confidentiality of the data in accordance with the regulations in force.

In the case of processing carried out using electronic and non-electronic processing methods and management and storage systems, including with state-of-the-art hardware and software, the Cassa may use third-party service companies that will be made aware of their responsibilities with notice of appointment as Data Processor pursuant to art. 28 of the GDPR.

5. **Data Retention Period**

The Data Controller will process the data for the time necessary to fulfil the above purposes and, consequently, in the event of termination of the associative relationship, the data will be destroyed or made anonymous, without prejudice to any retention terms provided for by law and the needs related to the institutional and organizational functioning of the Cassa.

6. Categories of subjects to whom data may be communicated.

In some cases, the execution of all activities connected with and/or instrumental to the management of the Cassa involves the communication of personal data, including special categories of data (e.g. data suitable for revealing the state of health) of the Assisted Persons and their family members who are beneficiaries of the services - in addition to subjects whose right to access them are recognized by law - to external Companies or Bodies, such as:

a) Servicing Companies in charge of the management of the *Operational Center* and *Contact Center* services of reimbursement requests and access management to direct assistance provided by affiliated structures network, the management of IT connections, consulting activities, legal and tax professionals, actuaries, financial advisors, auditors, CAAF, as well as other activities related to those indicated, which Cassa collaborates with.
b) Administrative service companies for: the management of reimbursement requests, the management of access to affiliated health facilities, assistance to patients, document management, for printing, enveloping and sending correspondence, etc.
c) Nursing homes, hospitals, laboratories, doctors, etc., which carry out activities connected, instrumental or supportive to those of the Cassa, or activities necessary or functional to the execution of the services requested by patients and their family members who are beneficiaries of the services.
d) Other entities in the insurance sector such as insurers, including companies or companies entrusted with the management of insurance policies stipulated in favors of the Cassa's Associates.

e) Other subjects who operate for the detection of the quality of services, market research, information, and commercial promotion of products and/or services; Authorities (judicial, administrative, fiscal – e.g., Tax authority – etc.). The subjects belonging to the categories to which the data may be communicated will carry out the processing of the data and will use them, as the case may be, as Data Processors expressly appointed by the Data Controller pursuant to the law, or rather as independent Data Controllers.

The Cassa designates as "authorized parties" all *pro tempore employees* and collaborators, including occasional ones, who carry out tasks that involve the processing of personal data.
Finally, the Cassa's Beneficiaries have visibility of the personal data, including those belonging to special categories, of their respective family members who are beneficiaries of the benefits.

7. Transfer of personal data outside the EU

In order to pursue the purposes described above, personal data may be transferred to other companies based in countries outside the European Union, and in particular:

United States of America and other countries: the transfer of personal data will be based on the existence of an adequacy decision of the EU Commission and/or on the adoption of the Standard Contractual Clauses drawn up by the EU Commission pursuant to Directive 95/46/EC, applicable from time to time and as subsequently amended and/or supplemented.

In this case, the Data Controller hereby ensures that the transfer of data outside the EU will take place in accordance with the applicable legal provisions.

- **Contact details of the Data Protection Officer**

Cassa has appointed the "*Data Protection Officer*" (*DPO),* pursuant to art. 37 of EU Reg. 679/2016, which can be contacted by *Data Subjects* at the e-mail address DPO@previass2.it.

- **Rights of the *Data Subjects***

In your capacity as an interested Party, the member and/or family member has the right to obtain:

- access to data.
- objection to processing.
- rectification, erasure, restriction of data processing.
- data portability.

as well as:

- withdraw consent.
- lodge a complaint with the Supervisory Authority (Data Protection Authority).

It should be noted that the right of the interested Party to object for the purposes referred to in Article 3 l. e) of this information by automated means, extends to the traditional ones and that in any case the possibility for the interested Party to exercise the right to object even only in part remains unaffected. Therefore, the *Data Subject* may decide to receive communications only through traditional methods or only automated communications or neither of the two types of communication.

10. **How to exercise your rights:** The Member may at any time exercise the rights attributed to him/her by sending a registered letter with acknowledgement of receipt to Previass II — Cassa Interaziendale di Assistenza per le Aziende Clienti del Gruppo Willis Italia S.p.A. (hereinafter "Cassa"), with registered office in Turin, Via Alfieri 11, to the kind attention of the *Data Protection Officer*, or an *e-mail* to: **info@previass2.it.**

11. Data Controller

The Data Controller (i.e. the Subject who determines the purposes and means of the processing of personal data, the "Data Controller" or "Data Controller") is Previass II — Cassa Interaziendale di Assistenza per le Aziende clientele del Gruppo Willis Italia S.p.A., in the person of its legal representative, with registered office in Turin - Via Alfieri n. 11, C.F. 97552610012, tel. 011.7652120/25, PEC*: previass2@previass2.mailcert.it*

The updated list and the names of the *DPO* and the Data Processors are kept at the registered office of the Data Controller.

All information relating to the protection of personal data, including an up-to-date copy of this policy, can be found on the website http://www.previass2.it

With reference to registration with the Cassa, pursuant to the provisions of EU Regulation 2016/679 ("GDPR"), the undersigned Company confirms that it has read this document and undertakes to promptly provide interested parties with this information, drawn up by Previass II, in its capacity as Data Controller, pursuant to art. 14 of the GDPR.

Company Stamp and Signature (of the Legal Representative)

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