

## Privacy Policy website <https://www.humanitas.net/>

We hereby inform users pursuant to Article 13 of Regulation 679/2016 (hereinafter "**GDPR**"), regarding the processing of personal data carried out through this website.

The processing of personal data is done in compliance with current legislation on the protection of personal data and is based on principles of correctness, lawfulness, transparency and data protection.

Please note that this policy refers exclusively to the data of those who interact with the services accessible from the home page <https://www.humanitas.net/> (hereinafter also referred to as the "**Website**" for brevity), without extending to other websites that may be reached by the user through links on the website.

In the web pages, where the collection of data takes place following the request for a service, specific information is made available and, where necessary, the relative consent is acquired.

### 1. Data Controller

The data controller of personal data is Humanitas Mirasole S.p.A, VAT n. 10125410158, with registered office in via Manzoni, 56-20089, Rozzano (MI), in the person of the legal representative *pro tempore*.

### 2. Category of interested parties

Humanitas Mirasole S.p.A. processes the personal data of users of the Website.

### 3. Type of Data Processed

Various types of personal data are processed through the Website:

#### 3.1. Navigation Data

- Technical Data

The computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the communication protocols of the Internet.

This category of data includes IP addresses or domain names of computers used by users who connect to the Website, URI (Uniform Resource Identifier) of requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response from the server (successful, error, etc..) and other parameters regarding the operating system and the user's computer environment. These Data are used only for statistical information (therefore they are anonymous), to check the correct functioning of the Website, and are deleted immediately after processing. The Data could be used to ascertain responsibility in case of hypothetical computer crimes against the Website as better reported in paragraph 5.

- Cookie

The Website collects personal data using cookies or similar technologies. For more information, please visit the Website's "[Cookie Policy](#)".

### 3.2. Data provided voluntarily by the interested party

In some parts of the Website, the Interested Party is required to enter certain personal data (both common and special categories of data) through, for example, filling in the *forms* in the Reservations section; subscribing to the "Stay in touch" service to receive the newsletter. On these occasions Humanitas Mirasole may also act in co-ownership with the other Structures of the Humanitas Group. In any case, specific policies on data processing have been prepared in each section of the Website.

### 3.3. Third Party Data

If the user decides to provide personal data of third parties, it is recommended to make sure that these subjects have been previously and adequately informed about the modalities and purposes of treatment here indicated.

## 4. Services offered by the site. Purposes of processing, legal basis and storage period of personal data

Humanitas allows the user to use various Services through its Website. For all that is not expressly described below, Humanitas has prepared specific *Policies on the processing of personal data* that allow the interested party to know the purposes, legal basis and further information on the processing of collected personal data.

### 4.1. Contact Section

Through the "Contacts" section of the Website, the interested party is given the opportunity to submit his requests, also of a clinical nature, to a series of Offices. The modality of acquisition of general information from the various Offices is exclusively by means of the e-mail sent by the interested party.

**Purpose of processing:** to provide feedback to requests for information, including clinical one, made by the interested party through the "Contact" section of the Website.

**Legal basis of the processing:** it is necessary for the performance of a contract to which you are a party (Art. 6.1, lett. b) GDPR), while the processing of special categories of data is necessary for purposes of treatment and for the protection of your health (Art. 9.2, lett. h) GDPR).

**Storage times:** personal data will be stored for the period necessary to achieve the above purpose.

### 4.2. Ascertainment, exercise and defence of rights in extrajudicial and/or judicial proceedings

The Data Controller, where necessary, reserves the right to process the personal data of the Interested Parties, collected through the Website, in order to ascertain, exercise or defend his own rights in extrajudicial and/or judicial proceedings or whenever the judicial authorities exercise their jurisdictional functions.

**Legal basis of the processing:** art. 6, paragraph 1, letter f) of the GDPR, "the processing is necessary for the pursuit of the legitimate interest of the data controller". To support this processing, in order to be able to demonstrate its legitimacy, the Data Controller has carried out a balancing of interests between the interest pursued and the rights and freedoms of the data subjects.

**Storage periods:** personal data will be stored for a period strictly limited to the duration of the litigation, until the time limit for appeals has expired.

#### 4.2. Optimization of offers, also through focused and selected analyses

The Data Controller, if you were to give explicit consent, may process your personal data in order to optimize the commercial offer, also through focused and selected analysis.

**Legal basis of the processing:** The processing of your common data takes place only with your express consent (art. 6.1, lett a) GDPR) and is revocable at any time, without affecting the lawfulness of the processing based on the consent given before such revocation.

In particular, you may opt out of receiving informational and promotional materials by accessing the Cookie Management area of the Website.

**Storage period:** The storage period for your personal data lasts until you revoke your consent.

#### 4.3. Sending advertising and/or commercial proposals

The Data Controller, if you were to give explicit consent, may process your personal data in order to send advertising and / or business proposals based on the profiling of your data, implemented to be able to highlight information and business proposals according to the interests that you have shown by accessing the pages and using the services available on this Website.

**Legal basis of the processing:** The processing of your common data takes place only with your express consent (art. 6.1, lett a) GDPR) and is revocable at any time, without affecting the lawfulness of the processing based on the consent given before such revocation.

In particular, you may opt out of receiving informational and promotional materials by accessing the Cookie Management area of the site.

**Storage period:** The storage period of your personal data for the purposes lasts until your consent is revoked.

#### 5. Methods of treatment, recipients and scope of communication of personal data

All data will be processed mainly in electronic format. Personal data as well as any other information that can be associated, directly or indirectly, to a specific user are collected and processed by applying technical and organizational security measures such as to ensure a level of security appropriate to the risk, taking into account the state of the art and the cost of implementation and, where applicable, security measures prescribed by specific legislation, such as, by way of example and not limited to, measures provided for by provisions issued by the Guarantor Authority for the protection of personal data or specific rules and regulations for the health / hospital sector.

Personal data will be processed by:

- persons authorized by the Data Controller to process personal data who have received appropriate operating instructions, are committed to confidentiality or are subject to an appropriate legal obligation of confidentiality;
- any third party service providers, who will act as Data Processors pursuant to art. 28, GDPR, only if this is necessary for the operation and maintenance of the Website and the services made available through the Website itself.

- subjects, bodies or authorities to which the communication of the personal data of the interested party is obligatory by virtue of provisions of law or orders of the competent authorities.

With the exception of the aforementioned hypotheses, personal data will not be disclosed and/or communicated to third parties.

Your personal data will be subject to profiling, as referred to in Article 22, paragraphs 1 and 4, of the GDPR.

## 6. Transfer of data outside the European Union

Personal data are not transferred to countries outside the European Union and the European Economic Area.

If such a transfer should become necessary and/or unavoidable due to the organizational needs of the Controller, please note that:

- it will only be made to countries in respect of which there is an adequacy decision adopted by the European Commission;
- in the case of a country other than that referred to in the preceding point, the transfer of data will be governed by the Standard Contractual Clauses without prejudice to the adoption, with the agreement of the Parties involved, of another of the safeguard measures established by art. 46 of the GDPR or the application of one of the derogatory mechanisms referred to in art. 49 of the GDPR.

## 7. Rights of the Data Subject and contact details of the DPO

In relation to the processing of personal data carried out through this Website, the interested party can know at any time the data concerning him, know how they were acquired, check if they are accurate, complete, updated and well kept, to enforce the rights recognized by art. 15 et seq. GDPR (right of access to data, rectification or cancellation of the data, right to limitation of processing or opposition to the processing, right to data portability, right to withdraw consent), by filling in the dedicated form on the website [www.humanitas.it/privacy](http://www.humanitas.it/privacy) or by writing to [privacy@humanitas.it](mailto:privacy@humanitas.it) or [privacy.humanitas@pec.it](mailto:privacy.humanitas@pec.it).

For any further activity related to data protection you can always refer to the Data Protection Officer (DPO), via Manzoni 113, 20089 Rozzano (Milano), email: [dataprotectionofficer@humanitas.it](mailto:dataprotectionofficer@humanitas.it).

If the interested party perceives a violation of the law in the processing of their personal data may complain to the Guarantor for the protection of personal data. This is without prejudice to the possibility of appealing to the competent judicial authority.

For further information on the rights and on the discipline of data protection in general, it is possible to visit the website of the Guarantor Authority for the protection of personal data, at the address <http://www.garanteprivacy.it/>.

## 8. Updates

This Policy may be subject to updates. Users are therefore invited to periodically check its content.