



INFORMATION NOTICE ON THE PROCESSING OF BENEFICIARIES' PERSONAL DATA *(pursuant to the General Data Protection Regulation (EU) 2016/679 (GDPR))*

ABOUT US AND TO WHOM THIS POLICY IS ADDRESSED

Cassa di Assistenza Sanint ("**Sanint**"), as an unrecognised association established to pursue welfare purposes pursuant to Article 51, paragraph 2, letter a) of the T.U.I.R. (Italy's Tax Code), promotes, implements and provides social welfare and/or healthcare services to its Beneficiaries ("**Data Subjects**"), including supplementary National Health System services in accordance with the criteria set out in Legislative Decree no. 502/92 ("**Services**").

The Services may be provided by Sanint either directly, including through the reimbursement of the healthcare costs incurred by the Data Subject, or indirectly, by resorting to the insurance market by underwriting insurance policies as a policyholder. With reference to the data processed during the provision of the Services, in the first case Sanint is the data controller, in the second case Sanint is only the policyholder of the insurance policy and is therefore only the controller of the Data Subjects' personal data processed at the time of the contract being stipulated and the Data Subjects taking out the insurance policy.

Sanint also spreads the culture of health and welfare prevention, promotes information initiatives and promotional campaigns for the well-being of the community of its member companies and their employees, and promotes health care programmes.

The purpose of this policy is to inform the Data Subjects about why and how Sanint, as the data controller, processes their personal data within the scope of the activities of the Articles of Association, as well as about their rights under the GDPR. This information, which is general in nature, may be supplemented by specific information referred to specific processing activities.

THE DATA CONTROLLER is Cassa di Assistenza Sanint, with registered office in Milan (20122), Via Uberto Visconti di Modrone 28, contactable via e-mail at privacy@sanint.it. Sanint has appointed a **DATA PROTECTION OFFICER ("DPO")** who can be contacted via e-mail at: dpo@rbtlegal.it.

WHAT DATA WE PROCESS

Sanint may process the following categories of Data Subjects' personal data: personal and contact data, such as tax code, name and surname, date and place of birth, address, gender, telephone number, e-mail address; family relationship with any members of the Data Subject's household who are registered with Sanint as beneficiaries; data relating to the employment contract that ties the Data Subject to the employer associated with Sanint, such as the Data Subject's professional position within the company he/she works for; additional data contained in identification documents: which may vary depending on the country of residence of the Data Subject, such as, for example, passport, identity card, driving licence; financial information, such as payment card number, IBAN and bank account number; income data; data relating to claims in the management of which Sanint may be directly or indirectly involved.

Health related data: Sanint may also process data relating to the Data Subject's health and data relating to health and social and medical expenses incurred by the Data Subject only if Sanint provides the Services directly, also in accordance with the reimbursement method for the health expenses incurred by the Data Subject.

N.B. Sanint does not necessarily process all the aforementioned data. Indeed, the type of data processed and the nature of the processing may vary depending on the circumstances, e.g. based

on the type of service provided and the method to provide it, the characteristics of the membership and enrolment process.

FROM WHOM WE RECEIVE DATA

Sanint generally acquires the personal data of the Data Subjects, in addition to the Data Subjects themselves, from: employers/associations/organisations to which the Data Subjects are linked (this occurs mainly during the registration phase with Sanint); other parties involved in the administrative and membership management and/or management of the Services, with which Sanint has contractual and/or agreement-based relations, such as insurance companies, insurance distributors, companies that maintain Sanint's IT structure, other service and consulting companies operating in the social and health and insurance sector, also possibly operating on behalf of member companies and healthcare facilities involved in the provision of the Services.

In particular, the data may be acquired through Marsh and also via the Marsh-owned My Marsh portal.

TO WHOM WE COMMUNICATE DATA

Sanint may disclose the personal data of the Data Subjects to parties with which it has contractual relations that are required for its administrative, membership and accounting management or for the provision of Services, and related activities, including operations necessary to fulfil its obligations. These parties include: experts, professionals, service companies and other entities specialising in providing of health and welfare services, credit institutions, consulting companies, service companies also specialising in the corporate welfare sector, professionals, insurance distributors, insurance companies, other companies specialising in the management of activities relating to the analysis and settlement of claims. It may sometimes happen that rather than communicating data to said parties, it is these parties themselves who collect and process the data on behalf of Sanint.

These parties may in turn process the personal data of Data Subjects in their capacity as autonomous data controllers, determining the purposes and means of processing, or in their capacity as data processors pursuant to Article 28 of the GDPR.

The insurance companies, with which Sanint, as policyholder, enters into contracts to guarantee the provision of the Services, act as independent data controllers of the personal data (including health-related data) of the Data Subjects for the pursuit of their own specific purposes, such as those of providing the Services covered in the insurance policy taken out by Sanint in favour of the Data Subjects, if necessary by retaining other parties handling claims as their data controllers. In such cases, therefore, Sanint does not process health-related personal data, insofar as it does not directly manage health services for the data subject.

Notwithstanding the foregoing, Sanint relies on certain Marsh Group companies to carry out certain activities, such as those relating to Sanint's administrative management and the management and provision of the Services only where these are provided directly (in the absence of insurance companies) by Sanint. These companies undertake the status of data controller limited to the processing of the Data Subjects' personal data carried out on behalf of Sanint.

In some cases, Sanint is obliged by law (main ref. Article 78, paragraph 25-bis, of Law no. 413 of 30 December 1991, and related measures issued by the tax authorities) to communicate to the Tax Registry Office certain personal data of the Data Subjects, including data relating to health expenses incurred.

Some types of personal data of Data Subjects may also be passed on to Members by virtue of the membership relationship of the Sanint member company.

TRANSFERS TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

Sanint may transfer the personal data of Data Subjects outside the territory of Italy and the European Economic Area, in which case adequate security measures pursuant to Articles 45-46 of the GDPR will be required.

WHY, AND ON WHAT LEGAL BASIS, WE PROCESS PERSONAL DATA

Sanint processes the personal data of Data Subjects in order to fulfil its **statutory purposes** and in particular to manage the membership and registration relationship (this also includes the management and processing of requests that Sanint and/or its data processors may receive from or on behalf of the Data Subject), in all its phases, including those phases that are preparatory to the completion of registration, and in order to provide Services to the Data Subjects and to perform all the functional and/or related activities, including administrative and tax activities and the activities relating to the management of requests for reimbursement of health expenses incurred by Data Subjects, the management of accident reports and the management of insurance coverage, where this is not managed through insurance companies. The activities mentioned in the Articles of Association include spreading a culture of health and welfare prevention, promoting information initiatives and promotional campaigns for the wellbeing of the community of member companies and their employees, and supporting health care programmes.

The processing of personal data is carried out by virtue of the membership to Sanint and the membership/registration of the Data Subject to Sanint, as well as in order to meet specific requests of the Data Subjects and to fulfil the obligations imposed by the laws and regulations in force, including those of a tax nature. The processing of personal data may also be necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

The processing of health-related data is based on i) the explicit consent given by the Data Subject or by the person representing him/her (for example, if the Data Subject is a minor) only where Sanint provides the Service directly, and ii) by virtue of Sanint's legal obligation to notify the Tax Registry Office pursuant to Article 78, paragraph 25-bis, of Law no. 413 of 30 December 1991, and the related measures issued by the tax authorities.

It should be noted that the Data Subject has the right to revoke its consent - where given - at any time, through the appropriate forms and procedures, where applicable, or in any case by writing to: privacy@sanint.it. Any revocation of consent shall not affect the lawfulness of the processing based on the consent prior to revocation, but could jeopardise the proper management of the contract and the provision of the Services.

HOW LONG WE RETAIN THE DATA

Sanint generally retains the personal data of Data Subjects for a period of 10 years from the termination of the membership/registration relationship or from the receipt of specific requests, e.g. relating to Services, unless the law stipulates otherwise. This term is necessary to fulfil the contractual, membership and legal obligations incumbent on Sanint, including those of a tax nature.

THE CONSEQUENCES OF FAILING TO PROVIDE DATA

The provision of data by Data Subjects is a necessary requirement for the proper management of the membership/registration relationship, as well as for the provision of Services. Therefore, failure to provide data could generically jeopardise the proper management of the relationship and the provision of Services and, depending on the case, could result in the exclusion, including partial, of the Data Subjects from the benefits deriving from their registration with Sanint.

THE RIGHTS OF DATA SUBJECTS AND HOW THEY CAN EXERCISE THEM

Data Subjects have the right to request from Sanint access to and the rectification or erasure of their personal data or restriction of the processing of their personal data or (where the processing is based on the need to pursue the legitimate interest of the data controller or of a third party) to object to their processing, as well as the right to data portability. Data Subjects also have the right to revoke consent, if consent has been given, where Sanint provides the Services directly.

In order to exercise the aforementioned rights, or for any questions or requests relating to this policy, or to communicate any changes in personal data, the Data Subject is invited to contact the Data Controller or the DPO appointed by the latter, respectively, at the following addresses (privacy@sanint.it; dpo@rbtlegal.it). Please note that the rights listed above are subject to limitations.

Data Subjects also have the right to lodge a complaint with a supervisory authority. If Data Subjects consider that the processing of their personal data infringes the provisions of the law, they have the right to lodge a complaint with the Data Protection Authority (Public Relations Office, Piazza Venezia, 11, - 00187 Rome, Telephone: (+39) 06.69677.2917 E-mail: urp@gpdp.it).

(Policy updated to December 2024)