PRIVACY NOTICE PURSUANT TO ARTICLE 13 OF EU REGULATION 2016/679 (GDPR)

Dear Sir/Madam,

Pursuant to the above-mentioned legislation, the processing of your personal data will be based on the principles of fairness, lawfulness, transparency, and protection of your privacy and rights. Therefore, in implementation of EU Regulation 2016/679, we are pleased to provide you with the following information.

Data Controller

ASP PAOLO RICCI, represented by its acting Legal Representative, with registered office at Via Luigi Einaudi no. 144, 62012 Civitanova Marche (MC), Italy.
Telephone: +39 0733 78361
Email: info@paoloricci.org
Certified Email (PEC): asp.paoloricci@emarche.it

Data Protection Officer (DPO)

Dr Anita Macente
Telephone: +39 049 0998416
Email: dpo@robyone.net
Certified Email (PEC): dpo.robyone@ronepec.it

Information on Data Collected Through Customer Satisfaction Surveys

Purpose of Processing
• Sending the invitation to complete the questionnaire. The identification and contact details used for such activities are extracted from the TGSpeedy management software.

• Accessing and completing the questionnaire. The IT systems and the operation of the website hosting the questionnaire form acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols (IP address). Such data are processed by the system only to the extent strictly necessary and proportionate to ensure network and information security, but are not visible to the Data Controller. In any event, the questionnaire fields do not contain personal data and the respondent data are anonymous.

• Processing survey results in aggregated and anonymous form.

• Possible follow-up contact where the user voluntarily provides contact details so that the Data Controller may contact them to obtain further information and/or improve the service.

Each user who has received a service accesses the questionnaire through Microsoft Forms via a link received by email. Once completed, the information is stored in a database that records responses without linking them to the invited individual or other directly identifying information, except for the follow-up purpose described above. Analysis is carried out exclusively in aggregated form.

Legal Basis for Processing

Purposes A, B, C and D do not require explicit consent, as the processing is necessary for the performance of a task carried out in the public interest pursuant to Article 6(1)(e) GDPR. Current legislation governing performance measurement and objective-setting within the Public Administration (Legislative Decree No. 150/2009) and the Digital Administration Code (Legislative Decree No. 82/2005) require the collection of user satisfaction information.

Categories of Data Recipients

Personnel authorised to process personal data; providers of electronic communication services, particularly email services; Data Processors appointed pursuant to Article 28 GDPR; and Microsoft for cloud-based data management. Data will not be disclosed, although aggregated and anonymous statistical reports may be published.

Transfer of Data to a Third Country

Processing takes place in Italy and questionnaire responses are stored within the European Union using Microsoft Cloud systems. Microsoft has been appointed as a Data Processor pursuant to Article 28 GDPR and is included among qualified suppliers under the Data Privacy Framework.

Data Retention Period

Data will be retained until the survey results have been fully processed and subsequently for a period not exceeding five years from the conclusion of the survey.

Mandatory Nature of Data Provision, Reasons and Consequences of Failure to Provide Data

Providing data is optional and failure to provide them does not affect access to the organisation’s institutional services. If contact details are not provided, no follow-up contact will be made.

Source of the Data

Collected directly from the data subject.

Existence of Automated Decision-Making Processes

No.

Processing Methods

Personal data will be processed electronically and through telematic systems and entered into relevant databases. Access is restricted to authorised persons, delegates and Data Processors designated by the Data Controller. External processing activities may be entrusted to reliable entities appointed as external Data Processors. For any processing activity different from the purpose for which the data were originally collected, the Data Controller will provide the data subject with all necessary information.

Rights of Data Subjects

At any time, the data subject may exercise the right to object to processing (Article 21 GDPR), access personal data (Article 15 GDPR), obtain rectification or erasure, and request restriction of processing (Articles 16, 17 and 18 GDPR). These rights may be exercised by contacting the Data Controller or the Data Protection Officer. A complaint may also be lodged with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) pursuant to Articles 15(1)(f) and 77 GDPR.