

# INFORMATION ON PERSONAL DATA PROCESSING IN RELATION TO THE COVID-19 EMERGENCY

#### 1. PURPOSES OF PROCESSING

Data shall be processed only for the prevention of Covid-19 infection and, therefore, for the protection of the health and safety of all workers within the FBK premises.

In order to facilitate a progressive, useful and safe integration of its working community and to estimate the portion that is still susceptible to the virus, FBK supports a serology testing program that, on a voluntary basis and through the occupational health physician and the Trento Province Healthcare System, the staff about to access the workplaces for the first time may join.

# 2. LEGAL BASIS FOR THE PROCESSING AND OBLIGATION TO PROVIDE DATA

The legal basis for the processing is the need to fulfill the legal obligations regarding labor and social security regulations to which FBK is subject, namely the implementation of the anti-contagion safety protocols pursuant to art. 1, c. 7, lett. d) of the Decree of the Prime Minister of March, 11 2020 and of the operational guidelines of the "Shared protocol for the regulation of measures to combat and contain the spread of Covid-19 in the workplace" of March 14, 2020, as well as pursuant to the provisions set forth in the ordinance of the President of the Autonomous Province of Trento of April 13, 2020 entitled "further measures for the prevention and management of the Covid-19 epidemic crisis".

Making the required statement and allowing the measurement of the temperature in real time is necessary processing in order to have access to the premises, therefore your refusal will make it impossible for you to access or to remain at FBK premises.

Voluntarily undergoing the serological testing promoted by FBK constitutes personal data processing aimed at a relevant public interest, namely the humanitarian aim of keeping the evolution of the epidemic under control and the related needs in terms of preventive medicine and occupational medicine. The legal basis for the personal data processing remains the consent given by the person concerned to the occupational health physician (Data Controller for this processing of personal data).

# 3. TYPES OF DATA PROCESSED

The following categories of data may be processed:

- 1) personal details;
- 2) data suitable for determining your health conditions, such as flu-like symptoms and body temperature (following measurement, if applicable).

#### 4. PROCESSING METHODS

Access to FBK premises will be granted to workers who do not exhibit or have had no contact with people who have flu-like symptoms such as cough, fever above 37.5 degrees, conjunctivitis, muscle pain: this is a necessary measure to prevent the spread of the virus.

FBK therefore requires **anyone accessing its premises** to issue a statement certifying the absence of flu-like symptoms and no contact with people who have exhibited symptoms in the previous 24 hours.

Also, FBK plans to carry out body temperature spot checks on people who have accessed its premises.

Data shall be processed as follows:

- manually as well as through automated systems;
- by persons authorized to perform these duties, in accordance with the law;
- using appropriate measures to ensure the confidentiality of personal data and avoid access by unauthorized third parties;

in contexts that do not affect the dignity and propriety of the person concerned

No automated decision-making process nor profiling activity is expected.

#### 5. DURATION OF PROCESSING

FBK shall not store the personal data acquired after the real-time measurement of your body temperature. FBK shall only record that the max temperature has been exceeded only if it is necessary to document the reasons that prevented access to the Foundation's premises.

Any personal data collected as for this information document will be stored by FBK until the end of the state of emergency caused by the Covid-19 outbreak has been decreed by national or local authorities, and, in any case, for a period not exceeding that necessary to fulfill the obligations referred to in point 2, and subsequently deleted.

The results of the serology testing (where performed) are stored by the occupational health physician and shared with FBK (exclusively anonymously and in aggregate form) for statistical purposes.

#### 6. DISCLOSURE OF DATA

No personal data collected by FBK will be disclosed or shared with third parties outside the specific regulatory provisions (eg in the event of a request from the Health Authority for the reconstruction of any close contacts of workers who have tested positive for Covid-19).

# 7. PLACE OF PROCESSING

Personal data will be processed only at FBK premises in Italy. No personal data collected pursuant to this informed consent document will be transferred to third countries.

#### 8. RIGHTS OF THE PERSON CONCERNED

We inform you that, pursuant to Chapter III of the GDPR, you can exercise the following rights at any time:

- request access to your personal data and obtain a copy thereof;
- if you consider them to be inaccurate or incomplete, request amendment or integration, respectively;
- if the legal conditions exist, refuse the processing of your data, request their cancellation (within the constraints of the provisions under art.17, paragraph 3, letter d of the Regulation for data necessary for scientific research purposes) or exercise the right to limitation;
- ask for the portability of your data to another subject in a format that facilitates its consultation and use;
- submit a complaint to the Supervisory Authority (Privacy Authority).

For information about the protection of personal data, including the exercise of the aforementioned rights, you can contact the FBK Safety and Prevention Unit at the following e-mail address: <a href="mailto:sicurezza@fbk.eu">sicurezza@fbk.eu</a>.

#### 9. DATA CONTROLLER

The Data Controller for the personal data of the people who access its premises is Fondazione Bruno Kessler (FBK), with registered office in Trento, via Santa Croce, 77 - <a href="mailto:segr.presidenza@fbk.eu">segr.presidenza@fbk.eu</a>, ph. +39.0461.314.621.

# 10. CONTACT DETAILS OF THE PERSONAL PO

The Data Protection Officer - DPO designated by FBK can be contacted through the following channels: <a href="mailto:privacy@fbk.eu">privacy@fbk.eu</a>, ph. +39.0461.314.370.