# **F.A.N.I.MAR.** Fondo Assistenza Nazionale Integrativa Marittimi Via Milano 40/C int. 3 - Sc. Dx 16126 GENOVA Tel. 010/2518524 — <a href="www.fanimar.it">www.fanimar.it</a> - e-mail: <a href="mailto:info@fanimar.it">info@fanimar.it</a>

# **ADMINISTRATIVE HEALTH COVERAGE**

Ship-owning Compa	ny	Maritime Agency			
Contact Person					
Address		City			
Telephone	Fax	Email			
BAN CODE: IT11Q0200		I.I.MAR. at UNICREDIT BANCA SPA count No. 000100215555– A.B.I.: 02008 – C.A.B: 01458 - C.I.N.: Q			
	PAYMENT: SEN	MI-ANNUAL () ANNUAL ()			
BAND AD (ex band AS) (individual rate Euro 1,403.00)					
TOTAL NRFO	OR TOTAL EURO	MONTHS			
BAND A (indivi	dual rate Euro 1,0	033.00)			
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BAND B (indivi	dual rate Euro 59	4,00)			
TOTAL NR FO	OR TOTAL EURO	MONTHS			
TOTAL €	·	SHIP-OWNING COMPANY/AGENCY STAMP AND SIGNATUR			
N.B. Kindly send us the	properly filled forms before	proceeding with the bank transfer.			
	SPACE RES	ERVED FOR FANIMAR			
Coverage Band AD	1st semester Euro	2nd semester Euro			
Coverage Band A	1st semester Euro				
Coverage Band B	1st semester Euro				
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FANIMAR SIGNATURE	:	Home hanking del			

#### **PRIVACY POLICY**

# pursuant to and for the purposes of Articles 13 and following of Regulation (EU) 2016/679 of the European Parliament and of the Council ("GDPR")

#### Introduction

The National Maritime Assistance Fund ("Fanimar") is a non-profit Fund aimed at providing social benefits to Workers and Pensioners ("Members") with particular attention to those of a healthcare nature, in addition to general assistance benefits, supplementing the National Health Service.

Fanimar is committed to protecting the privacy and confidentiality of the personal data it acquires and processes in the context of its institutional purposes, such as promoting, realizing, and providing benefits to its Members ("Data Subjects"):

i) healthcare benefits; ii) benefits other than healthcare, such as assistance benefits; iii) economic subsidies ("Benefits"). The Benefits offered by Fanimar essentially consist of: i) Benefits provided through Insurance Companies, with which Fanimar enters into specific agreements, and ii) Benefits provided directly by Fanimar.

This document outlines the methods and purposes of the collection, use, consultation, and processing of personal data carried out by Fanimar and the rights guaranteed to Data Subjects by the current Privacy legislation.

Below are the contact details of the parties involved in the processing of personal data

#### **DATA CONTROLLER:** Fanimar Assistance Fund

Via Milano 40 C/3, 16126 Genoa, Tel: 010.2518524, Fax: 010.2469079 Email: privacy@fanimar.it

#### DATA PROTECTION OFFICER: Lawyer Federica Rambaldi

Via Uberto Visconti di Modrone 28 20122 Milan, Tel: 02 56567604, Fax: 02 56567607 Email: dpo@rbtlegal.it

#### **CATEGORIES OF DATA SUBJECTS**

Fanimar, during and for the correct performance of its activities, may collect, use, consult, and more generally process personal data relating to the following Data Subjects:

- · individuals enrolled in the Fund
- family members of the Fund's members, even if surviving ("Family Unit")
- pensioners
- · individuals (natural persons) beneficiaries of coverages other than the above-mentioned subjects

### **CATEGORIES OF PERSONAL DATA**

Fanimar, during and for the correct performance of its activities, may collect, use, consult, and more generally process the following personal data of the Data Subjects:

- · Personal identification data: tax code, first and last name, date of birth, residential address, gender, relationship
- · Contact details: telephone number, fax number, email address, residential address, domicile address
- Main data relating to the employment contract linking the Data Subject to the employer Partner: contractual and/or employment relationship, professional classification
- Identifying details: identification numbers issued by agencies or governmental entities (e.g., depending on the Data Subject's country of residence, social security or national insurance number, passport number, identity card number, tax code, driver's license number)
- Financial information: payment card number, account number and bank details, income and other financial information
- Insured risk: information on the insured risk containing personal data
- Health data: health-related data, such as data revealing physical and/or mental health status past, present, or future, information about injuries, (risk of) illnesses or disabilities, medical treatments, examinations and checks received, relevant personal habits such as smoking or alcohol consumption, information about prescription medications, medical history.

# SOURCES OF PERSONAL DATA COLLECTION

Fanimar, during and for the correct performance of its activities, may acquire personal data of Data Subjects:

- · directly from Data Subjects during: (i) registration; (ii) requests for direct/indirect reimbursement of medical expenses
- from experts (including legal medical practitioners), experts, lawyers, accountants
- from other parties involved in the management of Benefits with whom Fanimar has contractual and/or Conventional (Insurance Companies, service companies, healthcare facilities)

via telephone, email, postal documents, hand-delivered documents.

In order to fulfill requests for direct/indirect reimbursement of medical expenses by Data Subjects, Fanimar will need to collect, use, consult, and more generally process health data. For the correct and lawful processing of these, the explicit and specific consent of the Data Subject will be necessary, without which Fanimar will not be able to process such data and consequently will not be able to provide Benefits.

To this end, Fanimar will provide Data Subjects with prior, specific, and adequate information and will collect explicit consent from the Data Subject. (cf. below CONSENT and WITHDRAWAL section)

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#### CATEGORIES OF RECIPIENTS OF PERSONAL DATA

Fanimar, during and for the correct performance of its activities, may transmit the personal data of Data Subjects to the following categories of subjects:

- · Data Processing Manager
- Experts (including legal medical practitioners), experts, lawyers, accountants
- Parties involved in the management of Benefits with whom Fanimar has contractual and/or Conventional relationships (Insurance Companies, service companies, healthcare facilities, credit institutions, consultancy and insurance brokerage companies)
- Employers
- · Public Authorities, Supervisory Authorities, and Tax Administration

#### PURPOSES OF THE TREATMENT OF HEALTH DATA AND LEGAL BASIS OF THE TREATMENT

Fanimar processes the personal data of Data Subjects in accordance with the provisions of the GDPR and Legislative Decree 193/2003 and its subsequent amendments and integrations.

This section defines the purposes for which Fanimar acquires, uses, and more generally processes personal data, illustrates the methods of sharing the collected information, and specifies the "legal grounds" on which the processing of information is based. If Fanimar intends to further process personal data for purposes other than those for which they were collected, before such processing, it will provide Data Subjects with information regarding such different purposes and any other relevant information provided for by the GDPR.

The processing of personal data is carried out to fulfill its institutional purpose, i.e., to provide Benefits to Data Subjects by virtue of their registration with Fanimar and the explicit consent given by the Data Subject for those particular categories of personal data (health data) for which the latter is necessary, pursuant to the GDPR (cf. below CONSENT and WITHDRAWAL section).

The processing of personal data may be carried out to safeguard the legitimate interests of Fanimar for defense in judicial proceedings or when required to comply with obligations imposed by the current legislative and regulatory framework.

For further information on the purposes of the processing of personal data, reference is made to the associative and contractual documentation of Fanimar.

### **CONSENT AND WITHDRAWAL**

Fanimar is prohibited from processing personal data revealing health data unless the Data Subject has given explicit consent to the processing of such data, necessary to execute the insurance contracts entered into collectively with the Insurance Company on behalf of the Data Subject or to execute reimbursements or subsidies provided directly by Fanimar. In the absence of explicit consent, Fanimar will not be able to process such data and consequently will not be able to fulfill its contractual obligations.

The consent to the processing of such data explicitly authorizes the Data Controller to share such data with the Data Processing Manager and any joint data controllers.

The Data Subject may withdraw consent to the processing of such data at any time, without affecting the lawfulness of the processing based on consent given before withdrawal. The withdrawal of consent implies the impossibility for Fanimar to fulfill its contractual obligations, with the simultaneous suspension of Benefits

#### **AUTOMATED DECISION-MAKING, INCLUDING PROFILING**

In accordance with Article 22 of the GDPR, Fanimar does not employ automated decision-making processes. Should they be utilized in specific cases, the data subject will be directly informed, in compliance with the current privacy regulations, both national and European. Fanimar does not engage in data processing for the purpose of assessing personal aspects (profiling).

#### SECURITY MEASURES

Fanimar adopts physical, electronic, and procedural security measures appropriate to the sensitivity of the information in their possession. These measures vary depending on the sensitivity, format, location, quantity, and methods of distribution and storage of personal data. They include measures aimed at protecting personal data against unauthorized access. Security measures include, if applicable, encryption of communications via SSL, encryption of stored information, firewalls, access controls, functional separation, and other similar security protocols.

Access to personal data is limited to staff and third parties who require access for appropriate and legitimate business purposes related to Fanimar's institutional objectives.

#### LIMITS TO COLLECTION AND STORAGE

Fanimar commits to processing (collection, use, disclosure, etc.) personal data for the fulfillment of specific contractual and associative obligations within the limits permitted by current privacy regulations, both national and European. If Fanimar needs to process personal

data for purposes other than those indicated in this notice, it undertakes to inform the data subjects of such different and additional purposes and to request the consent of the data subjects where such consent is necessary.

Personal data is retained for the period necessary to fulfill contractual and associative obligations, as well as to comply with legal obligations incumbent upon the data subjects and all parties involved in the processing, as well as for other permitted and related purposes or as provided by applicable law. When personal data is no longer necessary to fulfill contractual, associative, and legal obligations, Fanimar anonymizes it (with the possibility of further retaining and using anonymized information) or securely deletes it regularly, unless further processing is required (for a limited period) for the following purposes: compliance with retention periods provided by commercial and tax law.

#### **ACCURACY, RELIABILITY, TRANSPARENCY**

Fanimar guarantees that personal data is always processed accurately, completely, and up to date.

Data subjects can contact Fanimar at the email address privacy@fanimar.it to update their personal data.

Any questions about Fanimar's privacy practices should be directed to the Data Protection Officer (DPO) at the email address: dpo@rbtlegal.it.

#### **DATA SUBJECT RIGHTS**

All data subjects, i.e., individuals to whom personal data refers, have the following rights regarding the protection of personal data, which can be exercised against the Data Controller by writing to the following email address: privacy@fanimar.it or by communication sent by registered mail to Fanimar's registered office, Via Milano 40 C/3 16126 Genova:

- Right of access (Article 15 GDPR, i.e., request for information on the methods of use and processing of personal data),
- Right to rectification (Article 16 GDPR, i.e., correction of any inaccuracies in personal data),
- Right to erasure (Article 17 GDPR, erasure of personal data if there is no longer a legal basis for processing it or if the data subject withdraws consent),
- Right to restriction of processing (Article 18 GDPR, i.e., the data subject disputes the accuracy of personal data and processing of personal data is restricted for the time necessary to review the data subject's request),
- Right to data portability (i.e., receiving and transmitting to another controller) of stored personal data (Article 20 GDPR),
- Right to object (Article 21, paragraphs 1 and 2, GDPR: "1. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her under Article 6(1)(e) or (f), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. 2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing."),
- Right to withdraw consent to the processing of personal data, as indicated in the previous

#### **CONSENT AND WITHDRAWAL**

These rights are subject to some exceptions in order to protect public interests (e.g., prevention and detection of crimes). Fanimar undertakes to respond to the majority of requests to exercise the above rights within 30 days of receipt at the addresses indicated in this notice.

If Fanimar and the appointed DPO are unable to provide an adequate response to a request for clarification or a complaint, data subjects have the right to lodge a complaint with the Italian Data Protection Authority (Public Relations Office, Piazza di Monte Citorio no. 121 - 00186 Roma Telephone: (+39) 06.69677.2917 Email: urp@gpdp.it).

For any questions or requests regarding this Privacy notice, you can contact the DPO by writing to the following email address: dpo@rbtlegal.it.

Below are the details of the DPO: Federica Rambaldi, Via Uberto Visconti di Modrone 28, 20122 Milano.

## **PLEASE NOTE**

Right to object on a case-by-case basis under Article 21, paragraph 1, of the GDPR

The data subject has the right to object at any time to the processing of personal data concerning him or her under Article 6, paragraph 1, letter e) of the GDPR (public interest) and Article 6, paragraph 1, letter f) of the GDPR (legitimate interests). This also applies to profiling under Article 4, paragraph 4, of the GDPR. If the data subject exercises his or her right to object, Fanimar will refrain from further processing his or her personal data unless there are legitimate reasons for the processing that override the interests, rights, and freedoms of the data subject, or unless such processing is necessary for the establishment, exercise, or defense of legal claims.

Right to object in the case of processing for direct marketing purposes under Article 21, paragraphs 2 and 3, of the GDPR

If personal data is processed for direct marketing purposes, the data subject has the right to object at any time to the processing of his or her personal data for such promotional purposes; this also applies to profiling, insofar as it is related to direct marketing. If the data subject exercises his or her right to object to the processing of data for direct marketing purposes, his or her personal data will no longer be used for this purpose.

## CONSENT DECLARATION FOR THE PROCESSING OF HEALTH DATA

l, the undersigned	born in	on	
Tax Code_			
	acknowledge	:	
(i) the PRIVACY NOTICE above (pages (ii) that Fanimar, in order to fulfill reques (iii) that for the correct and lawful proce (absence, Fanimar will not be able to pro	sts for Services, will need to collessing of Health Data, my express	ect and process Health Data; s and explicit consent is required	, and that in its
hereby expressly and explicitly give out the provision of the Services when		e Data Controller, to process my	Health Data to carry
, date / /			
(SIGNATURE)			