

## homeTAO Privacy Policy

Data privacy is important to us. This means that we process data about identified or identifiable individuals, which is called personal data (hereinafter, "**data**"), with due care and in accordance with the General Data Protection Regulation (GDPR).

This Privacy Policy, effective as of January, 2019, is intended to describe how we **Instrumentation Laboratory, SpA** (hereinafter "IL" or "we"), located at Viale Monza, 338 -20128 Milano, process your data and reflects our commitment to protecting your privacy when using the homeTAO site <https://www.anthemaweb.it> (the "Site"), our platform to provide our Anti-Coagulant Therapy software solution (the "Service") to public and private Hospitals/OAT centers (the "customers" or the "data controllers").

It is important you to know that, if you are a **user** of our Site (this is, a patient of our customers), we are **data processors** of your **data**. Thus, in addition to considering the conditions set forth herein, please make sure that your Hospital/OAT center, as data controller (who decides how and why use your data for its purposes), has informed you of the Privacy Policy that applies to you.

We may update this Policy from time to time. When we do so, changes will be effective immediately upon posting the revised Policy to the Site. As a result, we recommend that you check this Policy on a regular basis. For further information or in case you have an unresolved privacy or data use concern, see the section "**How to contact us**".

### Information that you give us

As a **data processor**, we do not collect any data from you. We just process your data on behalf of the data controller and according to the instructions received established into the service agreement.

### How we use your information

As a **data processor** (the processing activities carried out by IL are always subject to the purposes and instructions stated in the **contract** signed with our customer), we want you to know that we may have access to some of your **data**:

- **Database maintenance, hosting, administration tasks:** We may have access to your data to attend your requests, carrying out the appropriate hosting and maintenance services, as well as administration tasks of the Site.

- **Resolution of incidents and/or concerns related to the Site:** Contact with you about our Service to help you with operational requests such as password change requests ("*Forget your password*" form) or clarifying any doubts or concerns you may have regarding to the Site ("*Help Line*" form).

**No further data processing activities, no further incompatible purpose/s pursued.**

## Sharing your information

According to the contract we have with our customers, we may use third party service providers to help us to provide our Service. During providing such services, this provider may access your personal data.

Nonetheless, we do not authorize such providers to use or disclose your personal information, except in connection with the provision of their services, and always subject to the purposes and instructions stated in the **contract** signed with our customer.

Please, be aware we may disclose your personal data in the following special circumstances:

- In response to a subpoena or similar investigative demand, a court order, or other request from a law enforcement or government agency; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law.
- When we believe disclosure is appropriate in connection with efforts to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our employees, or others; to comply with applicable law or cooperate with law enforcement.

## Time during which your information will be processed

This is a **decision to be made by the data controller**, remember, our customer. For further information, please check their corresponding Privacy Policy.

## Your rights

You have the ability to exercise your rights to request the access to and rectification or erasure of data or restriction of processing concerning you or to object to processing as well as the right to data portability. You can also withdraw the consent provided for the processing of your data at any time. **To exercise any of the aforementioned rights, you should contact the data controller.**

Whenever, in your opinion, the processing of your data involves an infringement of the legal requirements, you have **the right to lodge a complaint** to the Italian Control Authority (Garante per la protezione dei dati personali - Piazza Venezia 11, 00187 Roma, [www.garanteprivacy.it](http://www.garanteprivacy.it), [garante@gpdp.it](mailto:garante@gpdp.it) ).

## How we protect your information

We use reasonable administrative, technical, personnel and physical measures to safeguard the data we process from you against loss, theft and unauthorized use, disclosure or modification.

## How to contact us

If you have any questions, comments or concerns about our Privacy Policy or how we process your data (remember we are just data processors), you may contact us at [DPO-it@werfen.com](mailto:DPO-it@werfen.com) .

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## First layer of information

**Data Protection:** According to the definition of "Data Controller" provided in the GDPR (General Data Protection Regulation), the responsible for the processing of your personal data will your Hospital/OAT Center. For further information on the purpose/s, legal basis/s used, third parties involved in the processing and your rights, please check the Privacy Policy of your corresponding Hospital/OAT Center.

It is important for you to know that we (*Instrumentation Laboratory, SpA*) only process your data as on behalf of the Data Controller (Data Processors) and always subject to their instructions. For further information, you can visit our **homeTAO Privacy Policy (link)**.