



**CASA SOLLIEVO
DELLA SOFFERENZA - IRCCS**
L'OSPEDALE FONDATO DA PADRE PIO
SAN GIOVANNI ROTONDO

**INFORMATION ON THE PROCESSING
OF PERSONAL DATA – SUPPLIERS’ REGISTER**
General Data Protection Regulation – Regulation (EU) 2016/679 – GDPR
Personal Data Protection Code – Italian Legislative Decree 196/2003

Fondazione di Religione e di Culto «CASA SOLLIEVO DELLA SOFFERENZA» – Opera di San Pio da Pietrelcina
I.R.C.C.S. - Viale Cappuccini, s.n.c. - 71013 San Giovanni Rotondo (FG) - P.IVA e C.F. 00138660717

PREAMBLE. Registration in the Suppliers’ Register of the Fondazione di Religione e di Culto “Casa Sollievo della Sofferenza” – Opera di San Pio da Pietrelcina (hereinafter, “Fondazione”), through its Website [https://operapadrepio.4buyer.it/Portal/en/Login/Index] as well as any subsequent management of contractual relationships, entails the processing by the same Fondazione of the personal data provided by the applicant. This information is provided in order to allow the applicant to be aware of the processing of personal data concerning him/her, and to know and exercise the rights granted. Please read the information contained in “Privacy Notice – MANDATORY” and then click the “Acknowledged” button.

PURPOSES AND CONDITIONS OF LAWFULNESS (LEGAL BASES) OF THE PROCESSING

The Fondazione, as Data Controller, processes the applicant’s personal data (the “Data Subject”) in compliance with the applicable legislation, European Regulation 2016/679 (“GDPR”) and Italian Legislative Decree 196/2003 (“Privacy Code”). Personal data will be processed for the following purposes: registration, assessment and maintenance of the registration in the Suppliers’ Register of the Fondazione; management of every phase/aspect subsequent to the aforementioned registration and/or to the conclusion of contracts, including the conclusion of contracts, the management of supplies, the fulfilment of related administrative, accounting and tax obligations, as well as the management of disputes. Without prejudice to what is specified in the section “Processing of data using tools based on Artificial Intelligence (AI) in the context of online meetings”, the legal bases for the processing of personal data are Article 6.1(b) GDPR (processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract) and Article 6.1(c) GDPR (processing is necessary for compliance with a legal obligation to which the controller is subject).

TYPES OF DATA PROCESSED

Within the limits of the prerogatives laid down by law, and with the utmost confidentiality and only where strictly necessary, the Fondazione may process the following personal data of the supplier: company/identification and contact data, including telephone numbers and e-mail addresses, Tax Code and VAT number, etc.; data required by legal obligations (anti-corruption checks, anti-money-laundering, previous certifications, etc.); data relating to reputation and solvency; technical and publicly available data; audio-video data, in the case of processing operations that involve identification of the data subject through the use of Artificial Intelligence (see below the section “Processing of data using tools based on Artificial Intelligence (AI) in the context of online meetings”).

NATURE OF THE PROVISION OF DATA

The provision of data is required exclusively for the “Suppliers’ Register management purposes” specified above; failure to provide such data makes it impossible to proceed with the registration request in the Register and with the subsequent management of the relationship.

MEANS OF PROCESSING AND DATA RETENTION

The Fondazione systematically adapts its organisation and updates its tools in order to protect the data – processed both in paper and electronic form – against destruction, loss, unauthorised access, processing that is not permitted or is not consistent with the purposes of their collection, by adopting technical and organisational security measures appropriate to the risk. Each of the staff members authorised to process personal data is previously instructed and bound to confidentiality and professional secrecy; furthermore, by accessing the IT system, each staff member can only handle the data necessary to carry out the activities falling within his/her remit. The data provided will be retained in accordance with the applicable legal provisions and for the time strictly necessary to achieve the purposes indicated above. Additional retention criteria, where necessary, may be specified in the section “Processing of data using tools based on Artificial Intelligence (AI) in the context of online meetings”.

RECIPIENTS OF THE DATA

For the purposes indicated and within the limits allowed by law, personal data may be disclosed: to authorised staff of the Fondazione, who are instructed and bound by professional secrecy; to public or private bodies or organisations which, by virtue of law, institutional purposes, regulations or EU legislation, are entitled or required to know them; to the Judicial Authority and/or Public Security Authority in the cases expressly provided for by law; to Data Processors, i.e. external parties that process data on behalf of the Fondazione. Data will not be disseminated, except in the cases provided for by law. The territorial scope of the processing is Italy and the European Economic Area (EEA). Where the processing of personal data takes place through automated tools based on Artificial Intelligence (AI) (see the section “Processing of data using tools based on Artificial Intelligence (AI) in the context of online meetings”), data may also be transferred to countries outside the European Economic Area (EEA). In such circumstances, the transfer will take place in compliance with Articles 44 et seq. GDPR, ensuring verification of the existence of an Adequacy Decision (e.g. adherence to the EU-US Data Privacy Framework) and the presence of appropriate safeguards for the protection of personal data.

- The Data Processor for processing carried out through this website is S3K S.P.A. SECURITY OF THE THIRD MILLENNIUM - Via del Serafico, 200 - 00142 | ROMA (ITALY) – Fiscal Code and VAT: 15379561002.
- The Data Processor for processing carried out through automated tools based on Artificial Intelligence (AI) (see the section “Processing of data using tools based on Artificial Intelligence (AI) in the context of online meetings”) is the provider that supplies AI services to the Data Controller.

PROCESSING OF DATA USING TOOLS BASED ON ARTIFICIAL INTELLIGENCE (AI) IN THE CONTEXT OF ONLINE MEETINGS

The Fondazione may organise online meetings involving only its own staff or also the participation of external parties; alternatively, the Fondazione may take part in online meetings at the request of external parties. In each of the above cases, the Fondazione envisages the use of automated tools based on Artificial Intelligence (AI) for the recording, transcription and automatic summarisation of conversations between participants (hereinafter the “platform”), in order to facilitate effective sharing of contents between the parties, for example by avoiding burdensome manual transcriptions and obtaining summary support concerning actions, decisions and key points that emerged in the online meetings. The activities carried out during online meetings may concern every aspect of institutional internal and external relations. By way of example but not limited to: project definition, consultancy, technical support or other professional services provided remotely, discussions with candidates or persons acting in representation of or on behalf of public or private entities. During such online meetings the following personal data may be processed: identification data of external parties (e.g. supplier’s company name); identification data of each participant (e.g. first name, last name, professional role, e-mail, telephone); audio data (e.g. the data subject’s voice) and video data (e.g. the data subject’s image), classified as biometric data, collected exclusively for the identification of the participant and his/her association with the transcriptions and summaries automatically generated by the platform. Participation in online meetings does not entail an obligation to accept the use of the above-mentioned AI tools. Each participant is informed in advance and may consent to the processing by means of pop-ups or automatic disclaimers displayed by the platform before recordings and transcriptions start, with the option of refusing such tools and requesting alternative interaction methods. Furthermore, during online meetings the platform clearly indicates any recording and transcription features that may be active. The data collected are processed in compliance with the principles of lawfulness, fairness, transparency, data minimisation, integrity and confidentiality, and may be shared within the limits laid down by the applicable legislation. In particular, the use of AI, governed under the GDPR and the Personal Data Protection Code, also complies with Italian Law No. 132/2025 and subsequent amendments. The Fondazione will retain the registration, transcription and summary data generated by the artificial intelligence platform within each Organisational Unit that carries out the processing, applying the retention criteria laid down by the regulations applicable to the subject matter and the contents processed. The data will remain available to enable the exercise of the data subjects’ rights for as long as necessary to pursue the purposes indicated and, in any case, not beyond the periods laid down for the retention of data processed within the aforementioned institutional internal and external relations. The use of the platform does not entail the adoption of automated decision-making processes by the Fondazione, which may access the results of the recordings, transcriptions and summaries generated by the AI platform solely as support for its decision-making activities, which remain under the responsibility of its authorised staff. The legal basis for processing carried out through tools based on Artificial Intelligence (AI) is the data subject’s consent.

DATA SUBJECT’S PRIVACY RIGHTS (WHERE APPLICABLE)

The data subject has the right to receive this information on data processing. The data subject also has the right to request from the Controller: access to his/her personal data; rectification; erasure; restriction of processing; objection to processing; the right to data portability and the right not to be subject to a decision based solely on automated processing. Since processing is mainly based on the performance of a contract and on legal obligations, the right to withdraw consent applies only to any additional and specific processing operations for which consent may be requested, without affecting the lawfulness of processing based on consent before its withdrawal. The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (www.gdpd.it) or with the Supervisory Authorities of the European Union (https://digital-strategy.ec.europa.eu/en/library/list-personal-data-protection-competent-authorities).

EXERCISE OF THE PRIVACY RIGHTS – CONTACT DETAILS

The data subject or the person entitled may exercise privacy rights or request information using the following contact details:

Contact details of the Data Protection Officer (DPO):

Fondazione di Religione e di Culto «Casa Sollievo della Sofferenza» – Opera di San Pio da Pietrelcina - I.R.C.C.S. - UO Affari Generali, Legale, Contratti e Tutela della Privacy - Ufficio Privacy (RPD/DPO) - Viale Cappuccini, s.n.c. - 71013 San Giovanni Rotondo (FG) – ITALY; e-mail: privacy@operapadrepio.it - privacy@pec.operapadrepio.it.

Contact details of the Data Controller:

Fondazione di Religione e di Culto «Casa Sollievo della Sofferenza» – Opera di San Pio da Pietrelcina - I.R.C.C.S. - Viale Cappuccini, s.n.c. - 71013 San Giovanni Rotondo (FG) – Tel. +39 0882.410111 (“Hospital Switchboard”) – Operating Unit: UOC Acquisti e Logistica – Direzione Amministrativa.

This INFORMATION ON THE PROCESSING OF PERSONAL DATA – SUPPLIERS’ REGISTER is published on the website https://operapadrepio.4buyer.it/Portal/en/Login/Index and on the website https://operapadrepio.it/privacy (see document “[08_SUPPLIERS'-REGISTER]_INFORMATION-ON-THE-PROCESSING-OF-PERSONAL-DATA”).

UPDATED VERSION



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