



# STUDIO LEGALE MAGLIO & PARTNERS

## LUCERNA IURIS – INTERNATIONAL LEGAL NETWORK

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### Avvocato Marco Maglio

*Presidente del Giuri di Autodisciplina  
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K Data Clinical S.r.l.  
Via Orazio, 31  
00193 Roma

Milan, 23th May 2018

**RE: assessment of the legal compliance of the personal data processing management procedures pursuant to the current legislation on the protection of personal data and certification of the correct implementation of EU Regulation 2016/679 (General Data Protection regulation - GDPR).**

To K Data Klinical

with reference to the requirements established by the current legislation on personal data, as of today I have been able to carry out the necessary checks on the procedures and documentation used by you for the management of the charges imposed on the data controller to allow the adjustment of the processing of personal data to the EU Regulation 2016/679 (General regulation for the protection of personal data - the so-called GDPR).

This verification involved all the activities of data processing of your company.

The plan allowed to develop the following activities:

- 1) mapping of personal data processed
- 2) definition of the first version of the treatment register

- 3) evaluation of the review of the roles of data processing, including the decision to proceed with the appointment of a data protection officer (Data Protection Officer) and definition of the document appointing the parties authorized to process data
- 4) review of the information to be provided to data subjects for data processing
- 5) review of data processing activities against suppliers and definition of treatment processes
- 6) preliminary assessment of the treatments and risk analysis in relation to the need to carry out the impact assessment in the processing of personal data
- 7) analysis of the evaluation processes of the adequacy of the technical and organizational security measures adopted for data processing
- 8) definition of the processes necessary to guarantee the adoption of data protection processes through design (privacy by design) and protection by default (privacy by default)
- 9) definition of processes for handling the notification obligation for data breaches (data breach notification)
- 10) definition of the criteria for the conservation of personal data

By carrying out these checks, I have been able to review the treatment procedures already adopted by you and verify the minimum IT security measures with the subjects you use for the provision of IT services. This verification required the implementation of an adjustment plan that is described in the document attached to this declaration (Annex 1).

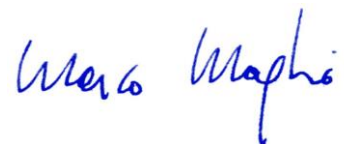
As a result of this verification I can acknowledge that the Holder, in order to prepare the documentation useful to certify the adoption of security measures suitable to prevent the illegal processing of personal data to be placed, has correctly carried out the adjustment activity to the EU Regulation 2016/679 and to proceed with updating the formalities required by the aforementioned legislation.

At the end of this review I can issue an opinion of full compliance of the processing processes with respect to the rules of the current legislation on the processing of personal data in the framework of EU Regulation 2016/679 for all companies in your Group.

Feel free to contact me to ensure the continuation of the adaptation and updating process and of your organizational procedures with respect to the frequent innovations that characterize this delicate subject, taking into account in particular the new rules introduced by the General Regulations for the protection of personal data (2016 / 679) will require a further implementation process after the date of full application of the same Regulation with effect from 25 May 2018.

Best regards.

Avv. Marco Maglio



Attachment– GDPR How to approach the change