Privacy Policy

If you are a member or attend our events

European Atherosclerosis Society ("**EAS**", "we", "our" and "us") care about your privacy and want to make sure that you feel safe when we process your personal data. In this privacy policy we want to inform you about how we process your personal data if you are a member, attend our conferences, congresses, educational activities (such as courses) or events ("**events**") or engage in the organization of activities on behalf of us.

We commit ourselves to be as transparent as possible regarding our processing of your personal data. Do not hesitate to <u>contact us</u> with any questions you might have regarding this privacy policy.

In summary: This is how we process your personal data

If you are a member, we process your personal data to:

- Provide your membership to you,
- Provide online education to you,
- Publish your personal profile page at EAS Community,
- Invite you to our events and send other marketing,
- Send you relevant member- and event information,
- Make sure we have an updated register over our members,
- Allow you to track your attendance and activity, and
- Comply with bookkeeping and accounting legislation.

If you attend our congress or events, we process your personal data to:

- Arrange events,
- Publish photos and videos from an event, and
- Send you newsletters and other marketing.

If you unsubscribe to receiving our marketing, we keep track of your wish in a "unsubscribe-list".

If you choose to engage in the organization of activities on behalf of EAS, we process your personal data to:

- Ensure that there is no conflict of interest,
- Ensure that our members and others are informed of your potential interests, and
- Manage actual and perceived conflicts.

When we arrange our congress, we will share your personal data with our professional congress organizer Kenes, which is based in Israel. This means your personal data will be transferred outside the EU/EEA in this case. We will also share personal data with other third parties such as local food-, venue- and service providers to be able to arrange or co-host an event. If the event is located outside the EU/EEA this means that your personal data will be transferred outside EU/EEA.

Your rights

In short you have the following rights:

- ✓ The right to lodge a complaint with a supervisory authority,
- ✓ The right to withdraw your consent,
- ✓ The right to access,
- ✓ The right to object,

- ✓ The right to erasure,
- ✓ The right to rectification,
- ✓ The right to restriction of processing, and
- ✓ The right to data portability.

More detailed descriptions of how we process your personal data, what rights you have and how to exercise them can be found by clicking on the links above.

Below you can read more about:

By pressing the selected heading, you will be moved to the relevant paragraph.

- Who is responsible and how to contact us?
- From where do we collect your personal data?
- Who can gain access to your personal data and why?
- Where is your personal data processed?
- Detailed description of how we process your personal data
- Balancing of interests assessments when processing personal data based on the legal basis "legitimate interests"
- What are your rights when we process your personal data? Detailed description

Who is responsible and how to contact us?

European Atherosclerosis Society, with company registration number 802418-0427, Första Långgatan 4A, 413 03 Göteborg, Sweden is responsible for the processing activities when you are a member or attend our events.

Please do not hesitate in contacting us on <u>office@eas-society.org</u> if you have any questions regarding our processing of your personal data, wish to delete your EAS-account or if you wish to exercise any of <u>your rights</u>.

EAS and our professional congress organizer partner, Kenes International Organizers of Congresses S.A ("Kenes"), are jointly responsible for the processing of your personal data when you register for and participate in our congress. Should you have any questions regarding our joint processing or wish to exercise one of your rights relating to such processing, feel free to contact EAS (see e-mail address above) or Kenes.

From where do we collect your personal data?

We collect your personal data directly from you when you register as a member, attend one of our events or engage in the organization of an activity on behalf of EAS. If you attend our congress or event, we as well collect your personal data from the partner that arrange the event with us, for example Kenes.

If you become a member by your society's application for a National Society Membership, we will initially collect your personal data from your society's administrator who submitted the application.

We will collect your personal data from other sources when you register as a member with your personal Facebook or LinkedIn account. We will then use data from Facebook or LinkedIn that you choose to share with us to create and administer your membership and profile.

When we cooperate with national atherosclerosis societies or our sister societies regarding matters such as events, we will collect your personal data from these societies if you are a member with them.

Who can gain access to your personal data and why?

We would never sell your personal data. Your personal data is primarily processed by our employees and only personnel who need such access to conduct their work.

To conduct our organization, we also need to engage suppliers and partners who will process your personal data as necessary to perform their tasks. We are responsible for any sharing of your personal data and to make sure your personal data is safe when shared with third parties. In summary we will share your personal data as follows:

We will share your personal data with our data processors. A processor processes data only on our behalf. This means that we are still responsible for the data they are processing. We share your personal data with the following categories of processors:

- We will share your personal data with a third party that provides our external member management system. This third party helps us with your membership, administrations and registrations to our events and to send you relevant memberand event information.
- When we arrange events, we will share your personal data with our providers of
 event services and in case of specifically our congress with our professional congress
 organizer Kenes. We will also share information regarding dietary preferences and
 accessibility requests with other third parties such as food-, venue- and service
 providers as necessary in order for you to participate in the event and fulfill your
 requests. We will also share your personal data with the photographer that takes
 your picture or video during an event. Your footage will be shared on our website
 and social media channels.
- We will share your personal data with our IT suppliers, e.g. for web development and hosting, who will process the personal data on our behalf and on our instructions to ensure good and secure IT operations. We only share your personal data with our IT suppliers if it is necessary for them to fulfil their obligations towards us according to the contract that we have with them.

Read more about this below under our <u>detailed description of our processing of your personal data</u>.

Where is your personal data processed?

Your personal data will mainly be processed within the EU/EEA.

In some cases, we will transfer your personal data outside the EU/EEA because our supplier is based there:

• When we arrange our congress, we will share your personal data with our professional congress organizer Kenes which is based in Switzerland. We rely on an

- adequacy decision regarding Switzerland recognized by the European Commission when transferring your personal data for this purpose.
- If you have booked an event outside the EU/EEA through us we will share your personal data with third parties such as the photographer in order to take photos, and local food-, venue- and service providers in the country where the event is hosted as necessary in order for you to participate in the event.

Prior to a transfer, third parties are required to sign a data transfer agreement with EAS that requires the third party to comply with applicable data protection laws.

If you want to know more about who we share your personal data with and how your personal data is transferred, please feel free to contact us. Our <u>contact information</u> can be found at the beginning of this privacy policy.

Detailed description of how we process your personal data

In the tables below you can learn more about what personal data we collect, what we do with it, what legal basis we have for the processing and who we disclose it to if you are a member of EAS or attend our events, have unsubscribed to our newsletters or if you engage in the organization of activities on behalf of us.

If you are a member

To provide your membership to you		
What processing we perform	What personal data we process	Our lawful basis for the processing
 Create and administrate your membership and profile, e.g. store your contact details. Communicate with you regarding your membership, e.g. send updated information about the terms for membership and send you any updates to this privacy policy. Allow you to get access to member benefits such as member-only areas of the EAS website, online educational content on EAS academy and registration at our events. We will process your date of birth to verify that you are a student or junior if you have stated so 	 Name Username Membership number User ID (old system) Password E-mail address Phone number Date of birth (if you are a student or junior) Organization or company of employment If you don't provide necessary personal data to us, you cannot be a member. Other personal data that you choose to provide to us: Home address 	Performance of contract (article 6.1 b in GDPR) The processing is necessary for us to fulfill the contract concerning your membership in EAS. If you don't provide such personal data to us, you cannot be a member. Legitimate interest (article 6.1 f in GDPR) Your personal data will be processed based on our legitimate interest to administer your membership with the additional information that you choose to provide us with.

- Title
- Date of birth (regular membership)
- Field of activity and/or interest
- Country (personal and/or professional)
- Professional category
- National Society
- Invoice details, if applicable
- CEL expiry date
- Email communication preferences
- Other information that includes personal data which you provide us through e.g. your resumé, a blog post or in a page

Storage period: Your personal data will be stored as long as you have an active account with EAS.

Accounts that have been inactive for one (1) year will be deleted along with personal data related to that account.

Sharing: EAS collects your personal data from you or your personal Facebook or LinkedIn account when you provide your details to us registering as a member. If you become a member by your society's application for a National Society Membership, we will initially collect your personal data from your society's administrator who submitted the application and you will become a member by that. You can always choose to delete your EAS-account.

To be able to provide a good membership experience to you and create a membership profile for you, we use an external member management system with whom we share your personal data with.

To provide online education to you		
What processing we perform	What personal data we process	Our lawful basis for the processing
 Administer your registration to get access to EAS Academy content Provide you with online educational content on the platform EAS Academy 	 Name Membership information, such as contact details Information about prior activities on EAS Academy 	Performance of contract (article 6.1 b in GDPR) The processing is necessary for us to fulfill the contract concerning your participation in online education. If we don't process your personal data we cannot provide online education to you.

Storage period: We will store your personal data for the purpose of providing online education as long as you have an active account with EAS.

Sharing: EAS collects your personal data from you when you provide your details to us registering to get access to EAS Academy content. To be able to provide you with online education, we use an external member management system with whom we share your personal data with, but only as our processor.

To publish your personal profile page at EAS Community		
What processing we perform	What personal data we process	Our lawful basis for the processing
 Enable you to create and publish a personal profile page at EAS Community Administrate your personal profile page Enable you to communicate with other members 	We only process the personal data for this purpose that you have chosen to publish and share with the community, such as: Name Membership information Age Title Field of activity and/or interest Country (personal and/or professional) Professional category National Society Memberships in EAS Community groups Profile picture Other photos of you that you post Other information about yourself that you put or post on your personal profile page Information about which members you have communicated with Comments you make on other members posts	Legitimate interest (article 6.1 f in GDPR) Your personal data will be processed based on our legitimate interest to publish and administrate your personal profile page. If we don't process your personal data you cannot publish your profile page at the EAS Community and use its functions.

Storage period: You can choose to have a hidden or visible personal profile page within the EAS Community. You also choose what you publish or post within the EAS Community. You can delete information from your personal profile page at any time or decide to have your personal profile page hidden. Otherwise your personal data will be stored for this purpose as long as you have an active account with EAS.

Sharing: The personal data on your personal profile page will not be shared outside the EAS Community. However, when you choose to have a visible personal profile page and publish or post information within the EAS Community, other members from countries all over the world will get access to your personal profile page and the information you have shared.

To invite you to our events and send other marketing		
What processing we perform	What personal data we process	Our lawful basis for the processing
Invite you to our events and send other marketing	 Name E-mail address 	Legitimate interest (article 6.1 f in GDPR) Your personal data will be processed based on our legitimate interest to be able to invite members to our events and to send other marketing. You have the right to object to receiving marketing from us.

Storage period: We will store your personal data for this purpose as long as you are still a member. If you object to our marketing or unsubscribe from our newsletters, we keep track of this in our "unsubscribe-list" to avoid sending you any further marketing material.

Sharing: To be able to provide a good membership experience to you and invite you to our events, we use an external member management system with whom we share your personal data with, but only as our processor.

To send you relevant member- and event information		
What processing we perform	What personal data we process	Our lawful basis for the processing
Communicate information and updates related to your membership	Contact information (such as name and e-mail)	Legitimate interest (article 6.1 f in GDPR) Your personal data will be processed based on our legitimate interest to keep you updated on information related to your membership.

Storage period: Your personal data will be stored as long as you have an active account with EAS. Accounts that have been inactive for a year will be deleted along with personal data related to that account.

Sharing: To be able to provide a good membership experience to you and send you relevant memberand event information, we use an external member management system with whom we share your personal data with, but only as our processor.

To make sure we have an updated register over our members		
What processing we perform	What personal data we process	Our lawful basis for the processing
 Tracking of your logins to your membership profile Communicate with you through e-mail to alert you about your profile deletion after six (6) months of inactivity 	 Name E-mail Login attempts Information about your unit IP-address Information about when you last logged in 	Performance of contract (article 6.1 b in GDPR) The processing is necessary for us to fulfill the contract concerning your membership in EAS. If you don't provide such personal data to us, we cannot provide your membership to you.

Storage period: Your personal data will be stored as long as you have an active account with EAS. Accounts that have been inactive for a year will be deleted along with personal data related to that account.

Information about your logins, will be stored for thirty (30) days.

Sharing: To be able to track if you are an active member, your membership activity is logged through an external member management system with whom we share your personal data with, but only as our processor.

To allow you to track your attendance and activity		
What processing we perform	What personal data we process	Our lawful basis for the processing
Administrate your membership page on our website to allow you to track your attendance history to our events	 Attendance history (what, if any, events you have previously attended) How long you've been a member Transaction history 	Legitimate interest (article 6.1 f in GDPR) Your personal data will be processed based on our legitimate interest to allow you to track your attendance to our events.

Storage period: We will store your attendance information for the purpose of analyzing attendance history while you are still a member, or until you request deletion of your personal data.

Sharing: To be able to provide a good membership experience to you and provide you with information regarding your attendance and activity history on your membership page we use an external member management system with whom we share your personal data with, but only as our processor.

To comply with bookkeeping and accounting legislation		
What processing we perform	What personal data we process	Our lawful basis for the processing
Store information in bookkeeping and accounting	Name, history regarding payments that have been made and other information that constitutes accounting records	Legal obligation (article 6.1 c in GDPR) The processing is necessary to comply with legal obligations to which we are subject, i.e. accounting legislation. You need to provide us with this information, otherwise we will not be able to administrate our relationship with you.

Storage period: We will store any document constituting accounting material and the personal data included therein according to the storage period stated in the accounting legislation.

In Sweden this mean that we will store your personal data for seven to eight years, i.e. until and including the seventh year after the end of the calendar year for the fiscal year to which the personal data relates.

If you attend our congress or events

To arrange events		
What processing we perform	What personal data we process	Our lawful basis for the processing
Administrate your registration or application to attend one of our events	 Name Contact information (such as phone number and e-mail address) Accessibility requests (if applicable) Dietary preferences you have informed us about (if applicable) 	Performance of contract (article 6.1 b in GDPR) The processing is necessary for us to fulfill the contract concerning your participation in an event. We will process personal data as necessary to arrange the event. Consent (article 6.1 a in GDPR) If we process sensitive personal data, such as information about your allergies or accessibility requests, we will obtain your consent.

Storage period: We will store your attendance information for the purpose of analyzing attendance history and send you information regarding new events as long as you are still a member, or until you request deletion of your personal data. Dietary preferences are deleted after the event.

Any other details, such as dietary preferences, relating to your registration to one of our events will be deleted once the event is finished.

Sharing: To be able to provide a good membership experience to you and administer your registration or application to attend one of our events, we use an external member management with whom we share your personal data with, but only as our processor.

If you participate in the congress, your personal data will also be processed by our professional congress organizer Kenes that helps us organize and arrange our congress. EAS and Kenes are jointly responsible for the processing of personal data for this purpose.

If applicable, we might also share information regarding dietary preferences and accessibility requests with food-, venue- and service providers in order to fulfill your requests.

In some cases, we work with third parties in connection with meetings and events to be able to arrange for services such as hotel booking services, ground transportation requirements or airline ticket issuance.

Transfer outside of EU/EEA: Our professional congress organizer is based in Israel, and therefore we will transfer your personal data outside the EU/EEA when we arrange our congress. We rely on an adequacy decision regarding Israel recognized by the European Commission when transferring your personal data for this purpose.

Since we have activities worldwide and require the use of services such as food and venue booking services, hotel booking services, ground transportation requirements, badge providers and airline ticket issuance we will transfer personal data outside of EU/EEA when we arrange activities outside EU/EEA.

To publish photos and videos from an event on our website and social media channels Our lawful basis for the processing What processing we perform What personal data we process • Take photos and videos of Your image in photos and Legitimate interest (article 6.1 f in GDPR) you during an event videos In cases where we want to process Publish your photo and video Your name, title and footage depicting a crowd, but on our website and social organisation, if you are a where you still can be identified, media channels to be able to speaker at our event your personal data will market our events processed based on our legitimate Share your photo and video interest to be able to document our with EAS' members events and make use of footage from the event in our member-only areas of our website as well as publicly on our website and social media channels. We always ask you before taking footage where you are clearly depicted. If you are a speaker at our event, publication of footage is part of your engagement. You can always object to our processing and we will only process your personal data after you have been given information about our publication and if you have not objected to our processing. By

participating in the event, you consent to the publishing of footage according to The Act on Names and Pictures in Advertising (Sw: lag (1978:800) om namn och bild i reklam).

Storage period: If we have published a photo or video of you from our event on our website or social media channels, the photo or video will be published until you ask us to delete it.

Sharing: The photographer that takes your picture or video will gain access to your personal data and will process your personal data on our behalf and following our instructions. If we publish a footage where you are depicted, your personal data will be shared on our website (including member-only areas) and social media channels as well as with members to the EAS society.

Transfer outside of EU/EEA: Since we have activities worldwide, we will transfer your personal data outside of EU/EEA when we arrange activities outside EU/EEA since the photographer will be located there.

To send you newsletters and other marketing		
What processing we perform	What personal data we process	Our lawful basis for the processing
 Send information about news, marketing, offers and invitations ("newsletters") to you that have attended or are registered to one of our events and consented to receiving our newsletters Improve and develop our newsletters by analysing how you open them and what you click on in the newsletters We only do this if you have consented to receiving marketing from us. We will perform the analysis with the help of our own analytic services. 	 Your name E-mail address Information about how you open our newsletters, e.g. what you click on IP-address 	Consent (article 6.1 a in GDPR) We only send you newsletters and other marketing if you consent to receive such information. You have the right to withdraw your consent at any time by unsubscribing to our newsletters or contacting us. The withdrawal of your consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Storage period: We send you relevant marketing to you until you withdraw your consent, object to our marketing or unsubscribe from our newsletters, in which case we keep track of this in our "unsubscribelist" to avoid sending you any further marketing material.

Sharing: To be able to send you relevant marketing that we believe could be interesting for you in your professional role, we use IT-services from our IT-suppliers with whom we share your personal data with, but only as our processor.

If you unsubscribe to receiving our marketing

What processing we perform	What personal data we process	Our lawful basis for the processing
If you have stated that you do not wish to receive marketing from us, we will store such information in an "unsubscribe-list" to make sure we do not send any marketing to you	Your nameE-mail address	Legal obligation (article 6.1 c in GDPR) The processing is necessary to comply with legal obligations which we are subject to, i.e. marketing law which require us to not send marketing material to individuals who have objected to receiving such marketing.
		We cannot make sure you will not receive marketing from us without processing your personal data for this purpose and you are therefore required to provide your personal data to us.
Storage period: You will be liste	d in our "unsubscribe-list" until furtl	ner notice.

our processor.

If you choose to engage in the organization of activities on behalf of EAS

We will process your personal data when you choose to engage in the organization of activities on behalf of EAS, e.g. when you candidate in an election to EAS Executive Committee, give lectures or perform similar activities on behalf of EAS. We will process your personal data in order to ensure that there is no conflict of interest when you engage in activities on behalf of us, to inform other members of your potential interests and to manage actual and perceived conflicts.

To ensure that there is no conflict of interest when you engage in an activity on behalf of us Our lawful basis for the processing What processing we perform What personal data we process • Facilitate your completion of Name Legitimate interest (article 6.1 f in GDPR) the Conflict of Interest • E-mail address Disclosure Form and collect Your personal data will be your personal data when you Your signature processed based on our legitimate fill out the form interest to ensure that there is no • Information you provide in conflict of interest, that EAS is free • Perform a conflict of interest the Conflict of Interest from bias and commercial check based on the Disclosure Form regarding influence, and to manage actual information you have your financial or in-kind and perceived conflicts. provided in the Conflict of relationships with the health Interest Disclosure Form industry or other similar organizations/societies that could represent a potential conflict of interest

Storage period: Information from your completed Conflict of Interest Disclosure Form, will be processed for this purpose during your engagement in the relevant activity (e.g. during the election) and then for a period of three (3) months.

We will ensure that we only process updated and relevant personal data about you by performing a new conflict of interest check once a year. We will then collect your personal data again, however, only if you indicate that you have something new to add to the Conflict of Interest Disclosure Form.

If you engage in an activity on our behalf, e.g. if you candidate in an election and are elected, we will continue to process your personal data for other purposes.

Sharing: To be able to provide a good membership experience, we use an external member management system with whom we share your personal data, but only as our processor.

	cision about the impact of the d	•
What processing we perform	What personal data we process	Our lawful basis for the processing
 Publish your completed Conflict of Interest Disclosure Form on our website (in relation to elections, the form will only be visible to other members) 	 Name Information you have provided in the Conflict of Interest Disclosure Form regarding your financial or inkind relationships with the health industry or other similar organizations/societies that could represent a potential conflict of interest 	Legitimate interest (article 6.1 f in GDPR) Your personal data will be processed based on our legitimate interest to uphold transparency towards our members and the public in general about potential conflicts of interest within the health industry.

Storage period: Information from your completed Conflict of Interest Disclosure Form, will be processed for this purpose during your engagement in the relevant activity (e.g. during the election) and then for a period of three (3) months.

If you engage in an activity on our behalf, e.g. if you candidate in an election and are elected, we will continue to process your personal data for other purposes.

Sharing: To be able to provide a good membership experience, we use an external member management system with whom we share your personal data, but only as our processor.

To manage actual and perceived conflicts		
What processing we perform	What personal data we process	Our lawful basis for the processing
 In case a conflict of interest check should show that there is an actual or perceived conflict, we will process your personal data in order to manage the conflict and assess the impact of the conflict Issue a written warning and/or exclusion from the relevant activity, if we assess that you cannot engage in the relevant activity due to a conflict of interest 	 Name E-mail address Your signature Information you have provided in the Conflict of Interest Disclosure Form regarding your financial or inkind relationships with the health industry or other similar organizations/societies which represent the conflict of interest 	Legitimate interest (article 6.1 f in GDPR) Your personal data will be processed based on our legitimate interest to ensure that there is no conflict of interest, that EAS is free from bias and commercial influence, and to manage actual and perceived conflicts.

Storage period: Your personal data will be processed for this purpose during the period of time that the conflict is managed. If you engage in the relevant activity, we will thereafter process your personal data during your engagement in the relevant activity (e.g. as long as your publication is relevant) and then for a period of three (3) months.

Sharing: To be able to provide a good membership experience, we use an external member management system with whom we share your personal data, but only as our processor.

Balancing of interests assessments when processing personal data based on the legal basis "legitimate interests"

As we state above, for some purposes, we process your personal data based on our "legitimate interest". By carrying out a balancing of interests assessment concerning our processing of your personal data, we have concluded that our legitimate interest for the processing outweighs your interests or rights which require the protection of your personal data. We have a strong interest in providing your membership experience to you in the best possible way, and therefore we will for some purposes process your personal data related to this interest.

If you want more information in relation to our balancing of interests assessment, please do not hesitate in contacting us. Our <u>contact information</u> can be found at the beginning of this privacy policy.

What are your rights when we process your personal data? Detailed description

You have certain rights that you can exercise to affect how we process your personal data. You can read a more detailed description about what those rights are below.

If you want to know more about your rights or if you want to exercise any of your rights, please <u>contact us</u> and we will help you.

Right to lodge a complaint with a supervisory authority (Article 77 GDPR)

You have the right to lodge a complaint with a supervisory authority.

The supervisory authority in Sweden is the <u>Swedish Authority for Privacy Protection</u> (Integritetsskyddsmyndigheten, the IMY).

In detail: Your right to complain exists without prejudice to any other administrative or judicial remedy. You have the right to lodge a complaint with a supervisory authority in the EU/EEA member state of your habitual residence, place of work or place of where the alleged infringement of applicable data protection laws has allegedly occurred.

The supervisory authority has an obligation of informing you on the progress and the outcome of the complaint, including the possibility of a judicial remedy.

Right to withdraw consent (Article 7.3 GDPR)

You have the right to withdraw your consent at any time by contacting us.

In detail. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Right to access (Article 15 GDPR)

You have the right to obtain confirmation as to whether we are processing personal data concerning you or not. You can make a request by <u>contacting us</u>. If we do process your personal data, you also have a right to obtain a copy of the personal data processed by us as well as information about our processing of your personal data.

In detail. The information we provide includes the following:

- the purposes of the processing,
- the categories of personal data concerned,
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations,
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period,

- the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning you or to object to such processing,
- the right to lodge a complaint with a supervisory authority,
- if the personal data are not collected from you, we provide you with available information about the source of the personal data;
- the existence of automated decision-making, including profiling, referred to in Articles 22.1 and 22.4 GDPR and, in those cases, meaningful information about the logic involved, as well as the significance and the predicted consequences of such processing; and
- where your personal data are transferred to a third country or to an international organization, you have the right to information regarding the appropriate safeguards, pursuant to Article 46 GDPR, put in place for the transfer.

For any further copies of the personal data undergoing processing requested by you, we may charge a reasonable fee based on administrative costs. If you have made the request by electronic means the information will be provided to you in a commonly used electronic form, unless otherwise requested by you.

Your right to obtain a copy referred to above shall not adversely affect the rights and freedoms of others.

Right to object (Article 21 GDPR)

You have the right to object to our processing of your personal data at any time.

In detail: Your right to object applies as follows:

- you have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on Article 6.1 e or 6.1 f GDPR, including profiling based on those provisions. We shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.
- Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing.
- Where you object to processing for direct marketing purposes, you have an unconditional right to have the processing of your personal data for such purposes ceased.
- In the context of the use of information society services, and regardless of Directive 2002/58/EC (ePrivacy Directive, or ePD), you may exercise your right to object by automated means using technical specifications.

Right to erasure ("the right to be forgotten") (Article 17 GDPR)

You have the right to ask us to erase your personal data.

In detail: We have the obligation to erase your personal data without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw your consent on which the processing is based, and there is no other legal ground for the processing;
- you object to the processing pursuant to Article 21.1 GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21.2 GDPR;

- the personal data have been unlawfully processed; or
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law that applies to us.

We will notify any erasure of personal data carried out in accordance with your rights stated above to each recipient to whom the personal data have been provided to, unless this proves impossible or involves disproportionate effort. If you want information about those recipients, you are more than welcome to contact us.

Please note that our obligation to erase and inform according to above shall not apply to the extent processing is necessary according to the following reasons:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law which applies to us; or
- for the establishment, exercise or defense of legal claims.

Your right to data portability shall not adversely affect the rights and freedoms of others.

Right to rectification of processing (Article 16 GDPR)

You have the right to obtain, without undue delay, the rectification of inaccurate personal data concerning you.

In detail: Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

We will communicate any rectification of personal data to each recipient to whom the personal data have been provided to, unless this proves impossible or involves disproportionate effort. If you want information about those recipients, you are more than welcome to <u>contact us</u>.

Right to restriction of processing (Article 18 GDPR)

You have the right to obtain from us restriction of the processing of your personal data.

In detail: Your right applies if:

- the accuracy of the personal data is contested by you, during a period enabling us to verify the accuracy of the personal data,
- you have objected to processing pursuant to Article 21.1 GDPR pending the verification whether our legitimate grounds override yours,
- the processing is unlawful, and you oppose the erasure of the personal data and instead request the restriction of their use, or
- you need the personal data for the establishment, exercise or defense of legal claims even though we no longer need the personal data for the purposes of the processing.

Where the processing has been restricted according to above, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

We will notify each recipient to whom the personal data has been provided to about any restriction of processing according to above, if this do not occur to be impossible or entails a disproportionate effort. If you want more information about these recipients, you are welcome to contact us.

Right to data portability (Article 20 GDPR)

You have the right to receive your personal data from us in a structured, commonly used and machine-readable format and, where technically feasible, have your personal data transferred to another data controller ("data portability").

In detail: The right applies if:

- the processing is based on the lawful basis consent or on a contract, and
- the processing is carried out by automated means.

The exercise of the right to data portability shall be without prejudice to the right to erasure, i.e. Article 17.

This privacy policy was last updated on 2025-04-01.