

PRIVACY POLICY

regarding the processing of personal data

Consent to the processing of personal data

Starting from May 25, 2018, Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) became applicable.

According to the provisions of the new GDPR Regulation – art.6 paragraph 1, there are six grounds on which personal data can be legally processed: Consent, Conclusion or execution of a contract, Fulfillment of a legal obligation, Vital interests, Public interest and Legitimate interest. Once at least one of the grounds listed above is respected, data processing is legal.

The RSN Association's Data Protection Policy is in accordance with the European Regulation regarding GDPR and takes into account the rights you have regarding the way your data is processed by the Association.

The Romanian Society of Nephrology Association complies with the principles of personal data protection set out in the GDPR, to ensure that all data is processed lawfully and transparently, collected for specified, explicit and legitimate purposes and processed in accordance with the rights of the data subject and in a manner that ensures adequate security and protection against unauthorized or unlawful processing and against loss.

This policy may be subject to periodic content changes, by updating the RSN Association *website*.

I. Personal data controller

THE ROMANIAN NEPHROLOGY SOCIETY ASSOCIATION (hereinafter referred to as RSN) is a Romanian legal entity under private law, without patrimonial purpose, a professional organization with a scientific and educational character, non-governmental and non-profit, headquartered in Bucharest, 62 Vasile Lascar Street, 1st floor, sector 2, with fiscal code 4681630, whose main purpose is to promote research in the medical field of interest and the continuous professional development of specialists in the field of "Nephrology".

The RSN Association holds the status of personal data controller.

II. Purposes of processing personal data

"Processing" means any operation or set of operations which is performed on personal data or on sets of personal data, such as collection, recording, organisation, storage, rectification, alteration, consultation, use, disclosure by transmission, restriction, erasure or destruction.

The RSN Association processes personal data, provided by you or previously collected from public sources, for the following purposes:

- a) informing you about the actions it takes to support the training and professional development of nephrologists in Romania,
- b) your participation in the actions mentioned in letter a).

If you no longer wish to receive these notifications, you have the right to object and/or request the deletion of your personal data from our database, by simply sending an e-mail to this effect to the e-mail address gdpr@srnefro.ro.

III. The basis on which the data is processed.

The personal data processing operations are carried out by the RSN Association on the basis of one of the following grounds:

- the processing is necessary for the conclusion or execution of a contract to which you are a party, such as the contract for participation in the actions/events to which you have registered by fully completing the registration form on the *website* www.srnefro.ro,
- the processing is carried out on the basis of your consent,
- processing is necessary for the purposes of the legitimate interests of the RSN Association (when processing is necessary for the performance of a contract to which the organization is a party), except in cases where your interests or fundamental rights and freedoms override these interests.

By accessing the *website* <https://srnefro.ro/> and by contacting the RSN Association in any way (email, telephone, through the contact form on the site) that involves mediated or direct communication between you and the RSN Association, you agree that your personal data will be processed by the RSN Association.

The RSN Association undertakes not to process this data for any purpose other than to respond to your request, except in situations where there is express consent to use it for other purposes.

IV. The categories of personal data we process

The categories of personal data that we process are closely related to the activity carried out by the RSN Association, being represented by:

- personal information, such as name, surname, date and place of birth, professional and/or personal address, *e-mail* address, personal and/or professional telephone number, professional experience, occupation/position held, professional specialty, professional degree, unique physician identification code (CUIM), etc.
- Location data,
- online identifiers, IP identifier,
- data collected from public sources and/or databases.

These categories of data or part of them are collected:

- either directly from you, when you send us a request, when you browse or interact on our site, when you voluntarily transmit this data to the RSN Association, in any form, as well as in other similar situations,
- or indirectly, for example, in certain circumstances, in carrying out the activity of the RSN Association and to fulfill certain legal obligations, we may collect certain personal data about you from other companies, entities, authorities or individuals.

V. Recipients of personal data operated by the RSN Association.

Your personal data may be communicated to other institutions or third-party natural and legal persons, directly or indirectly, for the purpose of carrying out the Association's activities.

We list below the recipients of personal data processed by the RSN operator:

- *Romanian College of Physicians.*

According to Decision no. 12/2018 of the RCP, which entered into force on 21.08.2018, in art. 11 point C, it is stipulated that Continuing Medical Education providers have the obligation:

"Send to the RCP only the list of participants present at the scientific event, in electronic format, a list that will contain the name, surname, specialty, professional/didactic degree and the doctor's unique identification code (CUIM - the six-digit code on the RCP membership certificate)."

Your refusal to provide the personal data required by current legislation makes it impossible to accumulate continuing medical education credits for the scientific event in which you participated.

- *Public institutions and authorities.*

The RSN Association is legally obliged to issue invoices for payments made to its bank account:

In accordance with the provisions of art. 319 paragraph 6 letter a) of Law no. 227/2015, the issuance of invoices to each beneficiary is mandatory for all deliveries of goods or services, except for the situations listed in art. 319 paragraph 10 of Law no. 227/2015:

- *Deliveries of goods/services to the population, for which the issuance of tax receipts is mandatory;*
- *Deliveries of goods/services to non-taxable persons, for which the issuance of legally approved documents is mandatory, such as travel tickets or subscriptions, tickets to shows, museums, fairs, etc.;*
- *Deliveries of goods/services to non-taxable persons which, by their nature, do not allow the identification of the beneficiary, such as deliveries of goods through vending machines, car parking services whose collection is carried out through vending machines, electronic recharge services of prepaid telephone cards."*

To issue invoices, it is necessary to provide the data controller with your personal data of a fiscal-legal nature, such as: CUI, workplace and city of the company/firm (in the case of legal entities) or your personal data = CNP and city (in the case of individuals).

- *Third parties, whether natural or legal, who may become aware of your personal data, directly or indirectly, as a natural consequence of the RSN Association's activities.*

By participating and attending events organized by RSN, by accessing the spaces allocated to the Association's events, as a participant or lecturer, you freely consent to being photographed and/or filmed during the event, and that your personal data (as shown in the image) may be captured in the photographs and/or videos taken by RSN. After this moment, certain frames/sequences from the events, photo and/or video montages, will be published on the Association's website and social media pages.

VI. Data storage period

The RSN Association retains the processed data only for the period necessary to achieve the purpose for which it holds the data, to satisfy your needs or to fulfill its obligations imposed by law, but not less than 5 years from the last participation.

If data processing is carried out based on your consent, your data will be kept until you express your will to delete them from the database, but not less than 5 years from your last participation.

VII. Data transfer abroad

The RSN Association does not intend to transfer data to third countries, except in the event that this transfer is necessary for the purposes agreed with you, in which case we will ensure that this transfer is made in accordance with the legislation in force and the regulation regarding the processing of personal data.

VIII. Rights of data subjects

Your rights regarding the personal information that the RSN Association processes are:

- *the right of access to processed data* - you have the right to access the personal data we hold and to obtain copies of the information,
- *the right to rectification of data* - you have the right to request that data be rectified if it is inaccurate or outdated and/or to complete it if it is incomplete,
- *the right to erasure of data ("the right to be forgotten")* - you have the right to obtain the deletion or destruction of personal data, in certain cases, for example, when you withdraw your consent, when the processing is no longer necessary or is contrary to legal provisions,
- *the right to restriction of processing* - you have the right to request restriction of the processing of personal data,
- *right to object* - you have the right to object at any time to the processing of your personal data when such processing is based on your consent or the legitimate interest of the data controller,
- *the right to data portability,*

- *the right to withdraw consent at any time* - you have the right to withdraw your consent to the processing of personal data where such processing is based on consent.
- *the right to file a complaint with the supervisory authority ANSPDCP* (www.dataprotection.ro).

VIII. Security of processing

The data controller RSN Association takes all technical and organizational measures to protect your data. All employees of the Association, as well as any third parties acting in the name and on behalf of the Association, are obliged to respect the confidentiality of information and the requirements of the Regulation.

IX. Contact

If you have any questions about how we process your personal data, please contact us at the *email* address: gdpr@srnefro.ro.

XI. Good to know:

LAW No. 190/2018 of 18 July 2018 on the measures implementing Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

LAW No. 363/2018 on the protection of individuals with regard to the processing of personal data by competent authorities for the purposes of preventing, detecting, investigating, prosecuting and combating criminal offences or the execution of penalties, educational and safety measures, as well as on the free movement of such data.

You can find more details on the website of the National Authority for the Supervision of Personal Data Processing: <https://www.dataprotection.ro/> .