



EDCTP

European & Developing Countries
Clinical Trials Partnership

Privacy Policy EDCTP Association

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1 Introduction

This Privacy Policy explains: the reasons for EDCTP collecting, holding and processing your personal data; the way we protect your personal data; and the rights you have over your personal data. This Privacy Policy has been influenced by the GDPR which came into effect on 25 May 2018.

It is our policy to protect the personal data we collect, hold and process. In preparation for the GDPR, we have recently reviewed our procedures for collecting and handling personal data, including our general internal controls over personal data to ensure that we comply with all the principles of the GDPR.

We make every effort to ensure that our processing of personal data is lawful. We process personal data on the following grounds:

- **Consent:** Processing is based on consent you have given to us;
- **Performance of a contract:** Processing is necessary for the performance of a contract;
- **Compliance with our legal obligations:** Processing is necessary for compliance with EU rules, Dutch law and other legal obligations; and
- **Legitimate interests:** Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or your fundamental rights and freedoms.

For each category of data subject, we have explained the purpose for which we collect personal data, how we control access to personal data, and the legal grounds for collecting, processing and holding the personal data.

2 Personal data we collect, hold and process

2.1 Category A: The personal data we collect, hold and process when we make job adverts

The personal data we collect, hold and process regarding job adverts are:

- Your name
- Your current address
- Your current employer
- Your email address(es)
- Your employment history
- Your educational background
- Any other additional information you may put on your CV.

The personal data we collect, hold and process under this category is used for shortlisting suitable candidates for vacant positions, inviting candidates for interview, and for drawing up contracts for the selected candidates.

The applications we receive are kept in our recruitment inbox, which is secure, and is restricted to HR and those involved in the selection process. The personal data of shortlisted candidates may be shared with EDCTP Travel and Administrative Officers if travel or other logistical arrangements are required. On the day of the interview, CVs and application letters of shortlisted candidates are given to interviewers for making references to during the interview. All documents printed for interviewers are shredded immediately after the interview. In the case of the recruitment of Directors, applications received are shared with GA members and may also be shared with a recruitment agency.

By applying for a vacant position, you have given us consent to hold and process your application.

2.2 Category B: The personal data we collect, hold and process for those who register on our website to receive EDCTP Newsletter or Regular EDCTP updates

The personal data we collect, hold and process for individuals who are interested in receiving a copy of our Newsletter and/or receiving regular updates are:

- Your name
- Your current address
- The organisation/institution you work for
- Your email address(es).

The personal data we collect, hold and process under this category are used solely for sending EDCTP Newsletter and updates.

Access to the personal data kept regarding EDCTP electronic updates is restricted to EDCTP Communication Officers and Constant Contact Inc., a US email distribution company. Constant Contact has safeguards in place to protect the personal data held on their servers. Constant Contact is a company certified under EU-US Privacy Shield Framework. Access to the personal data kept regarding EDCTP Newsletter is restricted to EDCTP Communication Officers and label printer companies, for printing labels and putting the newsletters in the post.

All individuals interested in receiving the EDCTP Newsletter and/or electronic updates must complete a form on EDCTP website expressing their interest (subscribing to receive either or both). By registering on the EDCTP website you have given us consent to process and hold your personal data.

How to unsubscribe from receiving EDCTP Newsletter and updates?

Individuals can unsubscribe from the EDCTP Newsletter at any time by simply sending an email to media@edctp.org, and similarly individuals can unsubscribe from receiving EDCTP updates by either sending an email to media@edctp.org or clicking the unsubscribe link at the bottom of each electronic EDCTP update.

2.3 Category C: The personal data we collect, hold and process for our current and previous employees

The personal data we collect, hold and process for our current and previous employees are:

- Copy of your passports or other identity documents
- Copy of your resident permits and visas (if required)
- Copy of diplomas and certificates
- Date of birth and remuneration details
- References and CV
- Home address
- Sick leave details
- Telephone numbers
- Name of children
- Country of origin
- Performance appraisal information
- BSN number
- Picture
- Bank details
- In case of conflict of interest, names of people they are conflicted to and the relationship.

The personal data we collect, hold and process under this category are used for making salary and other statutory payments; determining whether the employee has right to work in The Netherlands or South Africa; complying with statutory obligations; making visa applications (if required); assigning office equipment (mobile phone, laptops, and PCs); arranging travel insurance; creating logins; making honorarium and per diem payments; flight bookings; hotel bookings; arranging travel insurance, writing visa support letters; publishing the information on the website; and ensuring compliance with our internal policies and procedures.

Access to the personal data regarding personnel records is restricted to HR personnel and HR service providers (ADP, payroll provider; ArboNed, Company Doctor; and IT Healthcare, ArboNed sub-processor). All HR related documents are kept in either secured cabinets or in one of our secure computerised systems.

Our reasons for collecting, processing and holding personal data under this category include:

- Compliance with legal obligation;
- Performance of employment contract;
- Legitimate interests; and
- Consent.

It is necessary for EDCTP to process personal data (name and/or email address) for the purpose of offering a secure and efficient office environment (legitimate interests). Examples include: the use of IT software and systems require registration; documents created at work are linked to the author and access may be regulated and monitored; the use a key card, which is issued to each EDCTP employee for access to the building, creates a log file each time the employee uses it to enter the office building; use of office assets is also registered. For all these examples, only limited personal data is required and are deleted when the employment ends except for office documents containing personal data, which are kept as long as the underlying documents are relevant. Similarly, EDCTP has security cameras in the office in The Hague for the purposes of pursuing the legitimate interest of security. The camera footage is only used for security purposes and is only accessible by authorised staff for this specific purpose. The system is not used for any other monitoring. The data is only stored for a limited amount of time (about three weeks).

The name, job title, short biography and photograph of each of our current employees are placed on the EDCTP website. This is based on consent and EDCTP employees can request for their personal data, including their photograph, to be removed from the website.

2.4 Category D: The personal data we collect, hold and process for professionals (expert reviewers, Strategic Advisory Committee members, Audit Committee members, and GA observers) who travel on behalf of EDCTP

The personal data we collect, hold and process for professionals we work with are:

- Your name
- Your current address
- Your current employer
- Your email address(es)
- Your employment history and educational background (CV)
- Copy of your passport
- Bank details
- Gender
- Nationality
- In case of conflict of interest, names of people they are conflicted to and the relationship.

The personal data we collect, hold and process under this category are used for recruitment of members, making honorarium and per diem payments, flight bookings, hotel bookings, arranging travel insurance, writing visa support letters, publishing the information on the website, and ensuring compliance with our internal policies and procedures.

Access to the personal data regarding this category is restricted to EDCTP staff and service providers (including hotels, travel agents and travel insurance providers) where required.

Our reasons for collecting, processing and holding personal data under this category include:

- Compliance with legal obligation;
- Performance of contract;
- Legitimate interests; and
- Consent.

It is necessary for EDCTP to publish the names of members (process their personal data) for the purposes of achieving transparency (legitimate interests).

The job title, short biography and photograph of each of our current SAC members are placed on the EDCTP website. This is based on consent and SAC members can request for these details to be removed from the website.

Any processing of personal data related to the recruitment of professionals (SAC and Audit Committee members) is based on consent. By applying to become a member of SAC or Audit Committee, you have given us consent to hold and process your personal data.

We request for expression of interests from experts who are interested in becoming independent reviewers. On receipt of your application form your personal data is entered in our database of experts. This processing (including registration in EDCTPgrants) is also based on consent. By completing an application form, you have given us consent to hold and process your application

2.5 Category E: The personal data we collect, hold and process for Board and General Assembly members

The personal data we collect, hold and process for professionals we work with are:

- Your name
- Your current address
- Your current employer
- Your email address(es)
- Copy of your passport
- Gender
- Nationality
- In case of conflict of interest, names of people they are conflicted to and the relationship.

The personal data we collect, hold and process under this category are used for flight bookings, hotel bookings, writing visa support letters, publishing the information on the website, and ensuring compliance with our internal policies and procedures.

Access to the personal data regarding this category is restricted EDCTP staff and service providers (including hotels, travel agents and travel insurance providers) where required.

Our reasons for collecting, processing and holding personal data under this category include:

- Compliance with legal obligation;
- Legitimate interests; and
- Consent.

It is necessary for EDCTP to publish the names and affiliations of members (process their personal data) for the purposes of achieving transparency (legitimate interests).

2.6 Category F: Personal data we collect, hold and process for invitees to EDCTP organised events

The personal data we collect, hold and process for invitees to EDCTP organised events are:

- Your name
- Your current address
- Your current employer
- Your email address(es)
- Your employment history and educational background (CV)
- Copy of your passport
- Bank details
- Gender
- Nationality.

The personal data we collect, hold and process under this category will be used for identifying suitable participants, making per diem payments, flight bookings, hotel bookings, writing visa support letters, and ensuring compliance with our internal policies and procedures.

Access to the personal data regarding this category is restricted to EDCTP staff and service providers (including hotels, travel agents and travel insurance providers) where required.

Our reasons for collecting, processing and holding personal data under this category include:

- Compliance with legal obligation; and
- consent.

By registering to attend an EDCTP organised event and/or completing a Travel Request Form, you have given us consent to process and hold your personal data.

2.7 Category G: Personal data we collect, hold and process for visitors to our office in The Hague

The personal data we collect, hold and process for visitors to the EDCTP office in The Hague are:

- Your name
- Camera footage

The personal data we collect, hold and process under this category are used for security purposes only (legitimate interests).

The visitor log is kept in hard copy only at the reception desk. Security camera footage is only accessible to authorised EDCTP staff.

Visitors to the EDCTP office in The Hague are requested to register their names in a visitor log for security purposes. EDCTP has security cameras in the office in The Hague for the purposes of pursuing the legitimate interest of security. The camera footage is only used for security purposes and is only accessible by authorised staff for this specific purpose. The system is not used for any other monitoring. The data is only stored for a limited amount of time (about three weeks).

3 Retention of your data

We only retain your data if it is necessary in relation to the purposes for which they are collected or otherwise processed.

Category	Category description	Retention period
A	Job adverts	<p><u>Unsuccessful applicants</u> Destroyed within four weeks after the completion of recruitment</p> <p><u>Successful applicants</u> Is used to create the personnel file (see category C)</p>
B	Register to receive EDCTP Newsletter or Regular EDCTP updates	<p>It will be kept unless you unsubscribe at any time.</p> <ul style="list-style-type: none"> • To unsubscribe from the printed Newsletter, please send an email to media@edctp.org. • To unsubscribe from the electronic Update, please use the unsubscribe link at the end of the electronic Update.
C	Current and previous employees	<p>This will be kept throughout the period of your employment with EDCTP and will be deleted two years (or earlier if the records are no longer deemed relevant) after the employee leaves EDCTP unless EDCTP is under legal obligation to keep the records for a longer period of time. For example, EDCTP is required, under Dutch law, to keep fiscal related data for seven</p>

		years. Similarly, a copy of your passport and 'loonbelastingverklaringen' (payroll tax statements) must be retained for a period of five years after your departure from EDCTP, and in cases of a labour conflict EDCTP may keep the data longer if necessary.
D	Professionals	Five years after the final payment of the balance.
E	Board and General Assembly members	Your personal data will be removed from our website and our database of contacts when you cease to be a Board and/or General Assembly member.
F	Invitees to EDCTP organised events	Five years after the final payment of the balance.
G	Visitors to EDCTP office in The Hague	Security camera footage may be kept up to three weeks.

4 Your rights

In accordance with Regulation (EU) 2016/679 (GDPR) and Regulation (EC) No 45/2001, you have the following rights:

Right of access

You have a right of access to your personal data; you can request us at any time to give you access to your personal data.

Right of rectification

You have the right to request us to rectify any errors in your personal data.

Right to erasure

You have the right to request us to delete your personal data if the continued processing of those data is not justified.

Right to restriction of processing

You have the right to restrict us from processing your personal data at any time unless the processing is lawful.

Right to object

You have the right to object at any time to processing of your personal data if the processing of your personal data is based on 'legitimate interest' you may have the right to object. Where processing of personal data is based on 'consent,' you have the right to withdraw your consent at any time.

You can exercise your rights by contacting the EDCTP data controller (see contact information in section 7 below). You also have the right to lodge a complaint with the supervisory authority (Autoriteit Persoonsgegevens, <https://autoriteitpersoonsgegevens.nl/>) regarding the use of your data by EDCTP.

5 Who do we share your personal data with?

We may share your personal data with:

- Our external auditors, including European Court of Auditors, OLAF and EC operational auditors;
- Our IT service providers;
- File transfer service providers;
- The European Commission;
- EDCTP constituency bodies; and
- EDCTP Africa Office.

The EDCTP Secretariat has an office in Europe (The Hague, the Netherlands) and in Africa (Cape Town, South Africa), but functions as one office. For this reason, personal data may be transferred from Europe to our South African office. The EDCTP Africa Office will process personal data as much as possible in accordance with the data protection laws of the Netherlands, and will in any case adhere to the data processing principles set forth in Annex A of the 'Standard contractual clauses for the transfer of personal data from the Community to third countries (controller to controller transfers).' A data transfer agreement to this effect has been concluded between the two offices.

6 Data breach

EDCTP has developed a Personal Data Breach Policy that describes EDCTP's framework and procedures for the management of personal data protection breaches. The main objectives of this document are to:

- Ensure all incidents of personal data breach are addressed in an appropriate and timely manner;
- Ensure consistency in the handling of incidents;
- Act as reference guide for all EDCTP employees;
- Mitigate the possible adverse effects of any personal data breaches; and
- Ensure all EDCTP employees are aware of the importance of timely reporting of personal data breaches to the relevant EDCTP officials to ensure that the ones that are likely to result in a risk to the rights and freedoms of natural persons are notified in time to the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) and to data subjects without undue delay.

7 Contact information

If you have any comments, questions, concerns, or a complaint regarding the way EDCTP collects, hold or processes your personal data, please send an email to: info@edctp.org.