# European Federation of Statisticians in the Pharmaceutical Industry PRIVACY NOTICE

EFSPI is committed to protecting and respecting your privacy. We take your privacy very seriously and we ask that you read this Privacy Notice carefully as it contains important information on:

- The personal data we collect about you;
- How we look after your personal data when you visit our website (regardless of where you visit from);
- With whom your personal data might be shared; and
- Your privacy rights and how the law protects you.

#### WHO WE ARE

EFSPI is an association Incorporated in Denmark - **CVR-nummer** 39780909. EFSPI, the European Federation of Statisticians in the Pharmaceutical Industry, is open to constituted groups of statisticians. Eligibility for membership is open to one national group per country placing a major emphasis on technical and scientific activities directed at statisticians who are working in or for the pharmaceutical industry. Thus, EFSPI is engaged in statistical aspects of research, development, production, and surveillance of drugs and medical devices. The constitutional objectives of the Federation are:

- To promote professional standards of statistics and the standing of the statistical profession in matters pertinent to the European pharmaceutical industry.
- To offer a collective expert input on statistical matters to national and international authorities and organisations.
- To exchange information on and harmonise attitudes to the practice of statistics in the European pharmaceutical industry and within the member groups.

After constitutional meetings since 1990, the Federation was officially launched in August 1992. There are now 10 member groups including over 2000 pharmaceutical statisticians in Europe.

This Privacy Notice is issued on behalf of the European Federation of Statisticians in the Pharmaceutical Industry so when we mention "EFSPI", "we", "us" or "our" in this Privacy Notice, we are referring to the European Federation of Statisticians in the Pharmaceutical Industry for processing your personal data.

EFSPI is the controller and responsible for personal information obtained through its website - https://www.efspi.org/ by phone, email, in letters and other correspondence or in person.

#### LAWFUL BASIS FOR PROCESSING PERSONAL DATA

# 1. Contract

ICO states "You have a lawful basis for processing if:

- You have a contract with the individual and you need to process their personal data to comply with your obligations under the contract.
- You haven't yet got a contract with the individual, but they have asked you to do something as a first step (e.g. provide a quote) and you need to process their personal data to do what they ask.

# 2. Legitimate Interest

ICO states this is likely to be most appropriate where you use people's data in ways they would reasonably expect and which have a minimal privacy impact, or where there is a compelling justification for the processing.

There are three elements to the legitimate interests basis. It helps to think of this as a three-part test. You need to:

- Identify a legitimate interest;
- Show that the processing is necessary to achieve it;
- And balance it against the individual's interests, rights and freedoms.

## PERSONAL DATA WHICH WE COLLECT

## Personal data provided by you

We may collect personal data about you when you:

- Register as a Member of your local association
- Your local association has renewed their membership to EFSPI
- Register for an Event or SIG;
- Purchase or make payments for any products and services;
- Contact us through our website;
- Apply for a position on Council/Committees/SIGs;
- Sign up to receive our newsletter;
- Complete customer feedback or surveys;

The personal data collected in the above manner may include your:

- Full name;
- Postal address;
- E-mail address:
- Telephone number;
- Payment details;
- Biography;
- Reservation and/or booking details;

- Image and/or voice captured through photography, filming, videotaping and/or audio recording.
- Demographic data such as your date of birth, gender, educational background; job title; professional memberships; country;
- Any other information which may be collected in the course of our interactions with you.

# Personal data provided by 3rd parties

We may receive information about you from other sources (such as event reservation providers), which we will add to the information we already hold about you in order to help us improve how we provide our services to you.

# Special categories of personal data

The only special category personal data which we collect from you from time to time via our website is health information. For example, we may ask you to provide us with allergen information so that we can cater appropriately for you and/or access requirements so that we can facilitate appropriate access to the premises where we are operating. We will only collect that special category personal data with your explicit consent.

#### Personal data about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- Give consent on his/her behalf to the processing of his/her personal data;
- Receive on his/her behalf any data protection notices;;
- Give consent to the transfer of his/her personal data outside the European Economic Area; and
- Give consent to the processing of their special category personal data (further details relating to special category personal data is detailed below).

## **HOW WE USE YOUR PERSONAL DATA**

## Overview

We collect information about you so that we can:

- Identify you and where appropriate identify your affiliation to the local association and their membership to EFSPI;
- Manage your event bookings and ensure that we can provide you with a personalised and memorable experience with us;
- Process any applications for positions on Council/Committees/SIGs:
- Assist you with your queries in relation to our organisation;
- Review any papers or submissions;
- Detect and prevent fraud;
- Notify you of any changes to our website or to our services that may affect you; and
- Improve our services.

## Marketing

We would like to send you information by email about our products and services and special offers which may be of interest to you.

We will only send you marketing messages, for example Newsletter or invitations for events when you click to subscribe on our website or tick the relevant consent box when you provide us with your personal data. If you have consented to such receive marketing from us, you can opt out at any time by using the unsubscribe function on each of our emails or by contacting us directly through the "Contact Us" section of this website.

## WHEN WE MIGHT SHARE YOUR DATA WITH THIRD PARTIES

We do not, and will not, sell any of your personal data to any third party – including your name, address, email address or payment card information. We want to earn and maintain your trust, and we believe this is essential in order do that.

As an essential part of being able to provide our services to you, we do share your data with the following categories of third parties:

- Service providers that help us to get any purchases which you make through our website to you, such as delivery companies, payment service providers or that provide reservation systems for event venues;
- Service providers that help us to run our business such as marketing agencies, website hosting providers, website developers, email and newsletter distributors:
- Professional advisers including lawyers, bankers, auditors and insurers who
  provide advice to us when we require it;
- Law enforcement agencies in connection with any investigation to help prevent unlawful activity; and

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. If you would like any more information about the third parties which we work with to provide our services to you, please contact us on the contact details provided later in this Privacy Notice.

#### HOW WE KEEP YOUR PERSONAL DATA SECURE

To protect your information we have policies and procedures in place to make sure that only authorised personnel can access the information, that information is handled and stored in a secure and sensible manner, and all systems that can access the information have the necessary security measures in place. All employees, contractors and sub-contractors receive the necessary training and resources to ensure they understand their responsibilities in relation to all of our policies and procedures.

In addition to these operational measures we also use a range of technologies and security systems to reinforce the policies and procedures, including ensuring that:

- Access to personal data is strictly restricted to those employees who need to access this information as part of their role;
- We store your personal data on secure servers and unauthorised external access to personal data is prevented through the use of a firewall;
- Information used for reporting and/or customer profiling purposes is anonymised (so that it does not identify you);
- We store your personal data on secure servers:
- We exchange information potentially with member organizations in order to fulfill our services
- For SIGs we may keep your name on SIGs and e-mail address on webpages as contact person for others to join

## HOW LONG WE KEEP YOUR PERSONAL DATA FOR

We shall only retain your information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

If you would like more information about how long we retain specific types of your information, please contact us on the contact details provided later in this Privacy Notice.

#### TRANSFERS OF YOUR DATA OUTSIDE THE EEA

All information you provide via our website is stored on our secure servers within the European Economic Area ("EEA"), Switzerland or the United Kingdom. If any data that we collect from you is transferred to, or stored at, a destination outside the EEA, Switzerland or the United Kingdom at any time, we will update this Privacy Notice accordingly.

#### YOUR RIGHTS

## The right to access information we hold about you

At any point you can contact us to request the information we hold about you as well as why we have that information, who has access to the information and where we got the information. Once we have received your request we will make any attempt to respond within 30 days.

# The right to correct and update the information we hold about you

If the information we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is updated.

## The right to have your information erased

If you feel that we should no longer be using your information or that we are illegally using your information, you can request that we erase the information we hold. When we receive your request, we will confirm whether the information has been deleted or tell you the reason why it cannot be deleted.

## The right to object to processing of your information

You have the right to request that we stop processing your information. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your information to comply with your other rights.

# The right to ask us to stop contacting you with direct marketing

You have the right to request that we stop contacting you with direct marketing that is outside what is considered reasonable for a membership body to offer member benefits and to ensure good governance of the membership body.

# The right to data portability

You have the right to request that we transfer your information to another controller. Once we have received your request, we will comply where it is feasible to do so. For your security we may need to verify your identity before we process your instructions above.

#### **COOKIES AND TRACKING**

#### Use of cookies

A cookie is a small text file which is placed onto your device when you access our website. We may use cookies on this website to:

- Recognise you whenever you visit this website (this speeds up your access to the website as you do not have to log in each time);
- Obtain information about your preferences, online movements and use of the internet;
- Carry out research and statistical analysis to help improve our content, products and services and to help us better understand our customer requirements and interests; and
- Make your online experience more efficient and enjoyable.

In most cases we will need your consent in order to use cookies on this website. The exception is where the cookie is essential in order for us to provide you with a product or service you have requested.

# Consent to cookies

If you visit our website when your browser is set to accept cookies, we will interpret this as an indication that you consent to our use of cookies and other similar technologies as described in this Privacy Notice. If you change your mind in the future about letting us use cookies, you can modify the settings of your browser to reject cookies or disable cookies completely.

#### Turning off cookies

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website. For further information about cookies and how to disable them please go to the Information Commissioner's webpage on cookies: https://ico.org.uk/for-the-public/online/cookies/.

#### TAKE CARE WHEN LINKING TO OUR SOCIAL MEDIA SITES

Our website provides links to Websites from other organizations and social media sites. Once on any of these social media sites, please take care if you choose to post any information as this will be on a public domain and may be widely accessible. If you would like more information about how any information posted on these sites will be used, please read the sites' privacy notice carefully.

#### **CONTACTING US**

If you have any queries about this Privacy Notice, need further information about how EFSPI use your personal data or wish to lodge a complaint, please contact us by any of the following means:

- Phone us on: +44 (0)1625 664549
- Email us at: efspi@kingstonsmith.co.uk
- Write to us at: EFSPI, Chester House, 68 Chester Gate, Macclesfield, SK11
   6DY UK.

You also have the right to lodge a complaint with the Information Commissioner's Office directly. Further information, including contact details, is available at https://ico.org.uk.

## CHANGES TO THIS PRIVACY NOTICE

We may change this Privacy Notice from time to time. You should check this Privacy Notice occasionally to ensure that you are aware of the most recent version that will apply each time you access the website.

Where we have made any changes to this Privacy Notice which affects the manner in which we use your personal data, we will contact you by email to inform you of this change.

This Privacy Notice was last updated on 7. December 2018

Disclaimer: The information provided is for general guidance only, it is not legal advice and KSAM / Kingston Smith Group cannot be legally liable for any decisions made by the EFSPI Council on the basis of the information provided.