



# Privacy policy

## Medical Students' Society Iași

The **Medical Students' Society Iași** respects your privacy and is committed to protecting your personal data.

This privacy notice will inform you as to how and why we collect, use and share your personal data and will tell you about your privacy rights, how the law protects you and how to contact us.

### Purpose of this privacy notice

This privacy notice applies when you provide your personal data to SSMI, whether if that's because you are using our websites ([www.ssmi.ro](http://www.ssmi.ro), [www.congressis.ro](http://www.congressis.ro)) or providing the data in other ways such as Google Forms or via E-mail. Our website and products and services are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### Controller

The **Medical Students' Society Iași** is the controller and responsible for your personal data (collectively referred to as "**SSMI**", "**we**", "**us**" or "**our**" in this privacy notice). We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, please contact the DPO using the details set out below.

### Contact details

Our registered office is Strada Universității, Nr. 16, Iași, Romania.

If you have any queries relating to how we use your information please contact our DPO:

- Name: Chistol Mihăiță
- Address: strada Universității, Nr. 16, Iași, Romania
- tel: +40728790953
- [presedinte@ssmi.ro](mailto:presedinte@ssmi.ro)

You have the right to make a complaint at any time to the National Authority for Surveillance and Processing of Personal Data (NASPD), the Romanian supervisory authority for data protection issues (<https://www.dataprotection.ro/>). We would, however, appreciate the chance to deal with your concerns before you approach the NASPD so please contact our DPO in the first instance.

### **Changes to the privacy notice and your duty to inform us of changes**

This version was last updated on 31<sup>st</sup> of December 2023. From time to time, we may change our privacy notice. We will post a notice on our website to notify you of any significant changes or update you by other appropriate means.

### **Third-party links**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit (for example to see how they use your information and to find out how to opt out, or delete such information).

### **The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** - includes first name, maiden name, last name, title, date of birth and gender.
- **Contact Data** - includes postal and billing address, email address, telephone number and photos where you have agreed to provide this such as when participating at a conference.
- **Financial Data** - includes bank account and payment details.
- **Transaction Data** - includes details about payments to and from you and other details of products and services you have purchased and used from us.
- **Technical Data** - includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** - includes your **Congressis** ID and password, preferences, feedback, survey responses and opinions.

- **Usage Data** - includes information about how you use our website, member benefits, products and services, attendance at events or conferences.
- **Marketing and Communications Data** - includes your preferences in receiving marketing and membership communications from us.
- **Alumni Membership Data** - it may include employment status (employed, not employed, self-employed and etcetera), professional categories (branch of practices, grades and specialities) along with workplace(s), employer(s), start and end date.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Sensitive personal information (also known as **Special Categories of Personal Data**) is information which relates, for example, to your health, sexual orientation, race or religion. We may obtain sensitive personal information about you if you volunteer it during any of your contact with us.

We have additional obligations to treat sensitive personal information with appropriate care, taking into account the nature of that information. The best way to restrict the processing of your sensitive personal data is not to give it to us unless it is necessary for the services you are obtaining from us.

The information you provide to us is confidential and protected by law. The confidentiality of personal information is a top priority for SSMI. Your personal information is not shared with any external organisation, government department, local council, or marketing company. The information collected will be used solely to produce statistics and for statistical research. Analysis of the data will be in aggregate form and will not be used in any way that allows individuals to be identified.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **How your personal data is collected**

We use different methods to collect data from and about you including through:

- **Direct interactions**

You may give us your Identity, Contact and Financial Data and the Special Categories

of Data mentioned above by filling in forms or by corresponding with us by post, phone, email or otherwise.

This includes, for example, personal data you provide when you:

- o contact us (including when you use our social tools such as the chat bot);
  - o request marketing to be sent to you;
  - o enter a competition, promotion or survey;
  - o give us some feedback.
- **Automated technologies or interactions**

As you interact with our website, we may automatically collect Technical Data about

your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

### **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- When we need to contact you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other as we do not provide your data to a third party who may send direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting our DPO: tel: +40728790953 , [presedinte@ssmi.ro](mailto:presedinte@ssmi.ro).

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of the ways we use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Please contact our DPO: tel: +40728790953, [presedinte@ssmi.ro](mailto:presedinte@ssmi.ro) if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose / Activity	Legal basis for processing
<p>Membership administration such as: registering you as a <b>Congressis</b> participant;</p> <ul style="list-style-type: none"> <li>• processing your registration including: managing payments, fees and charges, collecting and recovering money owed to us;</li> <li>• holding your data on our membership database;</li> <li>• management and statistical analysis of our membership;</li> <li>• confirming your identity when you contact us;</li> <li>• contacting you about your membership.</li> </ul>	<p>a. Performance of a contract with you  b. In our legitimate interests  c. In the course of our legitimate activities</p>
<p>Sharing your personal data within the <b>Congressis</b>.</p>	<p>Some of your personal data will be available to <b>Congressis's</b> staff, <b>Congressis</b> organising committee members and elected officials .</p>
<p>To provide you with information and services that you request from us.</p>	<p>a. It is in our legitimate interests and  b. in the course of our legitimate activities - to respond to your queries and provide any information requested in order to generate and develop business. To ensure we offer a good and responsive service, we consider this use to be proportionate and will not be prejudicial or detrimental to you.</p>
<p>To send you alerts, newsletters, bulletins, announcements, and other communications concerning the <b>Congressis</b> or which we believe may be of interest to you</p>	<p>a. It is in our legitimate interests and  b. in the course of our legitimate activities to market our services. We consider this use to be proportionate and will not be prejudicial or detrimental to you. You can always opt-out of receiving direct marketing related email communications or text messages by following the unsubscribe link.</p>

<p>To invite you to events or other conferences we believe may be of interest to you.</p>	<p>It is in our legitimate interests and in the course of our legitimate activities to market our services. We consider this use to be proportionate and will not be prejudicial or detrimental to you. You can always opt-out of receiving direct marketing-related email communications or text messages by following the unsubscribe link.</p>
<p>To use data analytics to improve our website, products/services, marketing, member relationships and experiences</p>	<p>a. It is in our legitimate interests and b. in the course of our legitimate activities (to define types of members for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about products or services that may be of interest to you</p>	<p>a. It is in our legitimate interests and b. in the course of our legitimate activities (to develop our products / services and grow our business)</p>

### Third-party marketing

We will not share your data outside the **Congressis** for marketing purposes without your consent.

### Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

### Data security

We understand that the security of your information is important to you. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We use industry standard physical and procedural security measures to protect information from the point of collection to the point of destruction. This includes encryption, firewalls, access controls, policies and other

procedures to protect information from unauthorized access. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

## **Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data 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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

The criteria we use for retaining different types of personal data, includes the following:

- General queries - when you make an enquiry or contact us by post, email or telephone, we will retain your information for as long as necessary to respond to your queries. After this period, we will not hold your personal data for longer than one (1) year if we have not had any active subsequent contact with you.
- Legal and regulatory requirements - we may need to retain personal data for up to seven (7) years after we cease providing services and products to you, where necessary, to comply with our legal obligations, resolve disputes or enforce our terms and conditions.

Specific examples include:

- Membership records - we retain a record of your membership for seven (7) years after your membership ends or lapses for any reason.
- Website use - data relating to your activity is retained for two (2) years after last accessing.

In some circumstances you can ask us to delete your data: see 'request erasure' below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **Your legal rights**

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- (a) if you want us to establish the data's accuracy;
- (b) where our use of the data is unlawful but you do not want us to erase it;
- (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims;
- (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we

may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact the DPO:

SSMI Data Protection Officer:

- Name: Chistol Mihăiță
- Address: strada Universității, Nr. 16, Iași, Romania
- tel: +40728790953
- [presedinte@ssmi.ro](mailto:presedinte@ssmi.ro)

You have the right to make a complaint at any time to the National Authority for Surveillance and Processing of Personal Data (NASPD), the Romanian supervisory authority for data protection issues (<https://www.dataprotection.ro/>). We would appreciate the chance to deal with your concerns before you approach the NASPD so please contact our DPO in the first instance.

### **No fee is usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.