1. Introduction

This Privacy Policy applies to all the membership activities, websites and tools provided by IQN Path ASBL (collectively as “services” in this policy). Services are provided by IQN Path ASBL (unless otherwise noted). Where sub-contractors and other affiliates are engaged to execute activities on behalf of IQN Path ASBL, contractual commitments, policies and process will be in place to ensure continuity and compliance with this policy.

References to "data" in this Privacy Policy will refer to data that you provide us and that we use to perform our functions as a professional association. Reference to personal information or just information, means information about you personally that we hold and for which we act as custodian. IQN Path projects may also have separate additional Privacy Notices in relation to the specific project being performed.

Exemption for prior notification of data processing

IQN Path follows the exemption from the obligation of prior notification to the CNPD regarding data processing under the law that membership administration is deemed an innocuous processing activity and so processing operations are exempt from notification (Article 12 paragraph (2) and (3) of the amended Act of 2 August 2002, General Data Protection Law, Luxembourg).

2. Data we collect

2.1 Information we may hold about you.

Types of data

- Contact Information e.g. subscription to the IQN Path email list (for example an email address). In order to provide you membership services, you, or your organisation, provide us with your contact information when becoming a member or signing up to the IQN Path mail list (e.g. via the IQN Path website). To join the IQN Path mail list we ask your consent (as the legal basis) and we provide an unsubscribe function on our emails in case you wish to be removed from the mail list in future.

- Use of IQN Path services. We will also collect your contact details if you use of our services (in order to provide those services) for example if you contact us via a form on our
website, if you have an interaction with our team, or a respond to a survey or attend an IQN Path workshop, conference, meeting or other event. If you have attended an IQN Path workshop, meeting or event and are not subscribed to the IQN Path email list we shall not retain your contact details after the event has finished. If you wish to stay in touch with IQN Path please join the email list by subscribing via our website www.iqnpath.org.

- In the case of travel reimbursement claims for IQN Path approved travel, we will ask you complete a travel expense form where we will also collect your bank details in order to remit you monies due. We process this data at your request as a fulfilment of the order you have given us. We do not store banking details and after the data have been processed this data will be deleted from IQN Path’s databases unless you provide explicit consent for us to retain your details for future processing requests.

- On the occasion where IQN Path may need to verify your identify with a passport or ID for legal reasons or KYC processes (this is primarily for Board members) we do not store this data after the processing has taken place. Copies of your documents may still be held by the legal council or entity requesting them for KYC purposes.

- Project participation is subject to specific Privacy Notices related to the project. Participating in a specific project will always be accompanied with a clear explanation of the project, what data will be collected, how it will be used and who will have access to it and if we intend to publish aggregated results for scientific journal publication.

- Use of human tissue samples in IQN Path projects is tightly regulated and will be managed in accordance with the IQN Path Security and Data Management Policy.

Usage information.
We collect information about you when you interact with our websites and services. We use your contact details to provide the membership services and keep you up to date and informed of association activities e.g. mail list. We only use bank details to process your request for reimbursement. IQN Path does not accept or process credit card information.

IQN Path will not share data e.g. email list or banking data with any other party without your consent and shall only be used for the purpose that is has been collected. The email list shall not be used for marketing information without your consent.

- Device and browser data.
Depending on your internet browser settings, we may collect information from the device and application you use to access our services. Device data mainly means your IP address,
operating system version, device type, system and performance information, and browser type.

- Page tags.
  We may use third party tracking services that employ cookies and page tags to collect data about visitors to our websites. This data includes usage and user statistics. There is a pop-up window where you can consent to the use of cookies. Like most websites today, our web servers keep log files that record data each time a device accesses those servers.

- Referral information.
  If you arrive at an IQN Path website from an external source (such as a link on another website or in an email), we may record information about the source that referred you to us.

### Account Information

- Registration information.
  In the case where IQN Path asks you to create an account login, e.g. to a particular project or portal, when you register for an account, we may collect your first and last name, username, password and email address as well as data that you submit to the portal.

- Payment information.
  If you or your organisation makes a payment to IQN Path (for example membership fees or a donation), in order to process this request we require you to provide your billing details, a name, address, email address and financial information corresponding to your selected method of payment in order to process the payment at your request. We do not store payment information and we do not request or keep credit card details.

### Projects involving human biological material

- In the case where human biological material (e.g. blood or tissue samples) are used within IQN Path projects, these samples will be anonymised with the link to the individual being completely broken. Strict rules apply to the use of human tissue.

### 3. Using the information we collect

We process personal data about you where:
• You have signed up to benefit from our services;
• You have consented;
• IQN Path has legitimate interests of:
  • administration of the association’s membership;
  • administration of the service experience; and
  • delivering the services of the association that you have signed up for or requested.
• If processing is required to fulfil contract or services requested by you.

In each of the instances where we describe how we use your data in this privacy policy, we have identified which of the grounds for processing.

When you have consented we collect and use the following information about you:

• Contact Information. We use contact information to respond to your inquiries and send you information as part of the services.

  Examples

  If you submitted an inquiry through one of the online forms on our website, we provide your email address to a member of our team who will contact you to follow up your request.

• Cookies. We collect information from page tags and web beacons to allow us to determine the success of our website. We may also use page tags to allow an email sender (for a survey or form for example) to measure the performance of their email messaging and to learn how to improve email deliverability and how many times and if the email is opened. You may changed your browser settings to set your preference and consent to use of cookies on the website.

• How you use our services. We use information about how you have interacted with our websites to improve our website services for you and all users. Some examples relevant to you:

  Examples

We may collect information about part of the IQN Path webpage you have visited and your activity on our sites. We collect this information so that we can track the most visited and most useful parts of our website and helps us improve the website.
Of the above data we collect, we also carry out the following:

- Statistical analysis. We may use machine learning and statistical techniques on certain data in order to understand how people interface with our services and analyse this data for quality assurance purposes. For certain projects we may publish aggregated data that you have provided, data shall remain anonymous in any publication format this will always be stated in project specific privacy notice.

We process your personal information for the administration of the membership of IQN Path ASBL and as described in detail in this privacy policy.

We place clear limitations on the uses of data so that your privacy is respected and only the information necessary to achieve these legitimate goals. Our primary goal is to improve upon and make sure our services and messaging are relevant for all our users, while also ensuring that personal information of all users is respected and protected.

- Log data. We use log data for many different business purposes to include:
  - To monitor abuse and troubleshoot.
  - To track your preferences and create new services, features and content.
  - To track behaviour at the aggregate/anonymous level to identify and understand trends in submitted data or various interactions with you for our services.

- To manage our Services we will also internally use your information and data, for the following limited purposes:
  - To enforce our agreements where applicable.
  - To prevent potentially illegal activities.
  - To screen for and prevent undesirable or abusive activity.

- Legal uses. To respond to legal Requests or KYC requirements we may need to disclose any information or data we hold about you.

4. Publication of survey data you share
If we intend to publish collected, aggregated data from any survey or project for the purposes of furthering quality in pathology and improving science, this will be stated at the time of filling in the survey. Published data will always be aggregated and remain de-identified.

5. Information we share: Partners and Integrations

We do not share your information or data with third parties outside IQN Path unless we have your express consent or in the following:

- To help us provide certain aspects of our services we use affiliates, contractors and trusted key partners – in particular, we engage third parties to:
  - facilitate our email mailouts.
  - facilitate banking payments to you as requested.
  - track our marketing and website content.
  - to deliver and manage our membership and support services to you.

In these cases we work with approved third party contactors that have a contractual commitment to be compliant with our policies. We enter into confidentiality and data processing terms with all employees and contractors to ensure they comply with high levels of confidentiality and best practice in privacy and security standards and we regularly review these standards and practices.

For specific projects additional third parties may be involved, if this is the case it will be made clear in the Privacy Notice for the specific project.

- We also have to share information or data in order to:
  - meet any applicable law, regulation, legal process or enforceable governmental request.
  - enforce applicable policies, including investigation of potential violations.
  - detect, prevent, or otherwise address fraud, security or technical issues.
• protect against harm to the rights, property or safety of our members, the public or IQN Path ASBL and/or as required or permitted by law.

6. Cookies

We and our partners use cookies and similar technologies on our websites.

We may use cookies, that you agree to when you use our sites and, in the case of some cookies, for legitimate interests of delivering and optimizing our services. Cookies are small bits of data we store on the device you use to access our Services so we can recognize repeat users. Each cookie expires after a certain period of time, depending on what we use it for. Cookies are used for:

• To gather metrics about survey responses.
  For example, we may collect data about the clicks it took to complete a survey, if a user left and returned to a survey, skipped parts of a survey and how long it took to complete. However, this information is collated and kept at an aggregated and anonymized level only.

• For security reasons.
  We may use cookies to authenticate your identity and confirm whether you are currently logged in or determine if an incident impacts you.

• To provide you with personalized content.
  We may store user preferences, device and browser information, your profile information which includes, the level of usage of service and the web-pages on our site which you visit.

• To improve our services.
  We use cookies to measure your usage of websites and track referral data, as well as to occasionally display different versions of content to you. We use this information to develop and improve our services and content.

• Cookies.
  We, or our service providers and other third parties we work with, may place cookies when you visit our website and other websites or when you open emails that we send you, in order to provide you with more tailored content, and to evaluate if the content we provide is useful and effective. For instance, we evaluate which buttons are clicked on most often, and whether those clicks lead users to make better use of our tools, features
and services. We will not use this information for marketing purposes only for the purposes of improving our Services and website.

- Google Analytics.
  We may implement some Google Analytics services. Visitors to our websites may choose not to consent to certain types of Google Analytics tracking, this can be customized using the Google Display Network ads by using the Google Ad Preferences Manager and learn more about how Google serves ads by viewing its Customer Ads Help Centre. Google also provide a Google Analytics opt-out browser add-on if you do not wish to participate.

You can choose to remove or disable cookies via the settings on your browser.

7. Security

We take our responsibility to protect and secure your information seriously. IQN Path has implemented IT security and data management policies. A summary of key actions taken is provided below.

Physical Security and Compliance

IQN Path uses information systems and cloud services provided by Google who use technical infrastructure which are hosted within world-class, SOC 2 accredited data centers.

Access Control

IQN Path grants access to IQN Path databases to staff and contractors on an as-needed basis, reviews permissions quarterly, and revokes access when it is no longer required.

Security Policies

IQN Path maintains and regularly reviews and updates its information security policies. Employees and contractors must acknowledge policies on an annual basis and undergo additional training where needed for key job functions.

Personnel

IQN Path communicates and trains relevant personnel on its information security policies, employees and affiliates to sign non-disclosure agreements, and provides ongoing privacy and security training. We maintain a list of active data processors working for IQN Path.
Data Asset Management

We maintain a data asset registry which includes identification, classification, locations, retention, and disposal of data and information assets. Computers and IT devices are equipped with up-to-date antivirus software. Affiliates and subcontractors are also subject to our security policy. We use secure file transfer using encryption tools for transfer of sensitive data.

Information Security Incident Management

IQN Path maintains a security incident management process and breach reporting process covering the initial response, investigation, customer notification, public communication, and remediation. These policies are reviewed regularly.

Breach Notification

No method of transmission over the Internet and no method of electronic storage is perfectly secure; therefore although we maintain high standards we cannot guarantee 100% security. If IQN Path learns of a security breach, we will notify affected users so that they can take appropriate protective steps.

Information Security Aspects of Business Continuity Management

IQN Path data assets are backed up on a regular basis. Backups are encrypted and stored to preserve their confidentiality and integrity and availability.

Your Responsibilities

Keeping data secure is also your responsibility and it requires that you maintain the confidentiality of any IQN Path account passwords and using sufficiently secure passwords. You should also ensure that you have sufficient security on your own IT systems.

8. Data Retention

If you hold an account for an IQN Path project you are responsible for and control of this data and the time periods for which you retain this data. If you respond to a survey, the specific survey will state how long your responses will be stored and what they will be used for.
9. Data Transfers outside the EU

IQN Path ASBL will not transfer data assets of EU subjects outside of the EU. Data processing will take place within the EU. If any exceptions arise we will contact you for your consent.

10. Changes to our privacy policy

From time to time we update and change this Privacy Policy. The policy version will be clearly identified and you will be notified of changes and new versions posted on the IQN Path website.

11. Marketing

IQN Path ASBL will only contact you about IQN Path services. News and upcoming IQN Path Activities for IQN Path will be posted on the IQN Path webpage and IQN Path members area respectively which users may access at your leisure. You will only receive direct marketing to your email by third parties via IQN Path if you have explicitly provided consent for this. Finally, if you do not wish to see personalized marketing content on the web you can clear the cookies in your browser settings.

13. The data controller

IQN Path is a data controller of personal data about your regarding your membership, responses to surveys and data collected via our services and webpage or in our projects. Data is managed and retained according to the IQN Path security and data management policy. Business documents of IQN Path are held for 10 years for legal compliance.

14. Your rights

European members have certain legal rights to get data about whether we hold personal data about them. This includes being able to get a copy of data we hold about you, and to modify,
adjust, refresh, change or delete (under appropriate circumstances). Some of these rights might be liable to a few exemptions or limitations. We will react to your data access request in a reasonable time frame (and in all cases within 30 days).

If you want to exercise any of the above rights, please contact us via our support page on the IQN Path webpage: http://www.iqnpath.org/contact/

Alternatively, if you wish to modify cookie settings, you can do this by clearing the cookies in your browser.

Complaints

For those residing in the EU, if you wish to make a complaint about how we have handled a query submitted to us, you may contact your local data protection supervisory authority. IQN Path ASBL operates its business in Luxembourg, it operates under the Comission Nationale Pour La Protection des Donnees (CNPD) https://cnpd.public.lu/en.html (National Commission for Data Protection).