

General Data Protection Regulation (GDPR)

Privacy Policy

1. INTRODUCTION

General Data Protection Regulation (GDPR) includes rules on giving privacy information to data subjects according to Articles 12, 13 and 14 of the Regulation.

International Quality Network for Pathology ASBL, 61 rue de Rollingergrund, L- 2440 Luxembourg ("IQN Path") as data controller (hereinafter, "Owner"), informs, pursuant to art.13 EU Regulation 2016/679 (hereinafter, "GDPR"), that personal data of members or individuals or sponsor (hereinafter "data subjects") will be processed for the following purposes.

TYPES OF PERSONAL DATA

Data Controller process the following types of personal data:

- PERSONAL DATA, LIMITED TO EMAIL ADDRESSES AND CONTACT INFORMATION PROVIDED BY MEMBERS ASSOCIATES, CONSULTANTS AND ANY OTHER SUBJECT WHO HAS GOT RELATIONS WITH IQN PATH

PURPOSE OF TREATMENT

The information you provide will be treated in accordance with art. 6 letter. b) GDPR, for the following purposes Service:

- all data are processed only to promote and pursue the scope of the association as mentioned in the Statute (Institutional scope in accordance with art. 6 letter. f) GDPR, for purposes connected and instrumental to the achievement of the associative purpose)
- set up and promotion of projects and events
- organization of meetings and teleconference
- communications to members
- coordination of project and of project's results
- communications to accountants, lawyers and Public Authorities
- execution of contracts
- when required by law

MODE, PLACE AND DURATION OF TREATMENT The processing of personal data is only to promote and pursue the scope of the association as mentioned in the Statute (Institutional scope in accordance with art. 6 letter. f) GDPR, for purposes connected and instrumental to the achievement of the associative purpose). Data Controller takes all necessary security measures to prevent unauthorized access, disclosure, alteration or unauthorized destruction of Personal Data. The treatment is done by computer and / or telematic tools. In addition to the data controller, other subjects have access to data (Internal Data processor: Chatrina Melcher Sixel - executive director and Chiara Marianna Coscia – secretarial service).

PLACE

The data are processed with a drive and the mailing and contact list.

DURATION OF TREATMENT

Data will be retained in e-mail boxes and drive of the Association until the data subject will be affiliated to IQN Path or in case of third parties until termination of the purpose for which the data is processed (e.g. participation to meetings or projects)

DATA COMMUNICATIONS

Data Controller can communicate the personal data for the purposes of service of art. II.1) to supervisory bodies, judicial authorities as well as to all other persons to whom disclosure is required by law for the fulfillment of those purposes, as autonomous controllers, without the data subject express consent under art. 6 letter. b) and c) GDPR

RIGHTS OF Data subjects

The categories of data subjects shall be entitled to exercise the rights under the art. 15 GDPR . The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information: the purposes of the processing; the categories of personal data concerned; the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations; where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; the right to lodge a complaint with a supervisory authority; where the personal data are not collected from the data subject, any available information as to their source.

In relation to the treatments described in this Policy, the interested party may, under the conditions provided by GDPR, exercise the rights set out in Articles 15 to 21 of GDPR and, in particular, the following rights:

- **access rights - Article 15 GDPR:** the right to obtain confirmation of whether or not the data is processed and gain access to personal information, including a copy of the same.
- **right of reply - Article 16 GDPR:** the right to obtain, without undue delay, correction of inaccurate personal data concerning you and / or completion of incomplete personal data;
- **Cancellation right (right to oblivion) - Article 17 GDPR:** the right to obtain, without undue delay, cancellation of personal data.
- **right to treatment limitation - Article 18 GDPR:** the right to obtain from the controller restriction of processing where one of the following applies: the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; the controller no longer needs the personal data for the purposes of the processing, but they are required

by the data subject for the establishment, exercise or defense of legal claims; the data subject has objected to processing pursuant to [Article 21\(1\)](#) pending the verification whether the legitimate grounds of the controller override those of the data subject.

- **right to data portability - Article 20 GDPR:** right to receive, in a structured format, common and readable use by an automatic device, the personal data provided to the Owner and the right to send it to another holder without hindrance, if the treatment is based on consensus and is carried out by automated means.
- **right of objection - Article 21 GDPR:** Right to object, at any time for reasons relating to particular situations, to the processing of personal data relating based on the condition of legitimate interest legality or performance of a public interest task or the exercise of official authority, including profiling, unless there are legitimate reasons for the owner to continue treatment that prevail on interest, on the rights and freedoms of or for the establishment, exercise or defense of a legal claim. In addition, the right to object at any time to treatment if personal data are processed for direct marketing purposes, including profiling, to the extent that is connected to this direct marketing. The above rights may be exercised against the data by contacting the references described above.

The exercise of the rights as an interested party is free under Article 12 GDPR . However, in the case of requests manifestly unfounded or excessive, even for their repetitiveness, the Owner may charge a reasonable contribution expenses, in light of the administrative costs to handle the request, or deny the satisfaction of the request.

RIGHT OF WITHDRAWAL

Data subject has the right to withdraw consent at any time. The withdrawal of consent shall not affect the lawfulness of the processing based on consent before the withdrawal.

HOW TO EXERCISE THE RIGHTS

To exercise the rights of the articles above, the data subject may, at any time, please contact the data controller via Email gdpr@iqnpath.org

Making a complaint

The supervisory authority in Luxembourg for data protection matters is the Commission National pour la Protection des Données – CNPD. If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the CNPD. The violation will be communicated within 72 hours from the breach and governed by “Personal Data Breach Policy”.

DATA CONTROLLER

The data controller is IQN Path ASBL, 61 rue de Rollingergrund, L- 2440 Luxembourg, e-mail office@iqnpath.org

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.

DATE LAST MODIFIED

This information was last updated on February 5, 2020. The mailing address of IQN Path was updated on October 1st, 2020.

ACCEPTANCE: The receipt of this privacy policy authorize IQN Path to process your data as above mentioned, unless you expressly refuse the processing sending an e mail to gdpr@iqnpath.org

International Quality Network for Pathology ASBL

Nicola Normanno