

Data Protection Policy

Version 23.05.2018

1. Introduction

At the European Resuscitation Council (ERC), we care greatly about your privacy. In order to protect the security and confidentiality of your data, we have developed our Data Protection Policy with the professional help and continuous support of our suppliers-Processors (see below).

Their high standards and strong controls for information security allow us to protect your critical and sensitive personal data contained in our information systems. As such, we prevent your personal data from being compromised, altered, lost, destroyed, published or disclosed without proper authorisation.

The ERC is ready to meet the challenges of the [General Data Protection Regulation](#) ("GDPR"). Let us explain in a bit more detail...

2. Who has access?

Controller

The **Controller** of your data in the ERC databases is the European Resuscitation Council vzw, Emile Vanderveldelaan 35, 2845 Niel, Belgium, Tel. +32 3 246 46 66, secretariat@erc.edu, registered in Belgium under company number BE0461.204.217.

Processors

The ERC relies on the continuous support of the **Processors** as listed in Attachment (1). The ERC has agreements with these Processors (art. 28-29 GDPR Regulation) and is supervising that these Processors comply with the GDPR Regulations.

Third parties - Recipients

Neither the Controller, nor the Processor are involved in selling personal data of their users to third parties.

In order to provide certain contractually agreed services in the context of the ERC applications, the Processor has recruited the third party services as listed in **Attachment (2)** as **Recipients** for the given purposes and may have to share personal data with such third parties. These third parties are authorised to process personal data for the stated purposes and within the given limitations.

In case of transfer of personal data to a third country, such access is only granted upon the adequacy decision of the Commission or the appropriate or suitable safeguards as specified in art. 45-46 GDPR Regulation.

Yourself (the Data Subject)

Each registered person can visualise his CoSy data by logging in on <https://cosy.erc.edu>. You can update most of the user data in your account; for corrections of names however the Controller may ask for additional supporting documentation.

Commitments regarding partners of the ERC

All suppliers are thoroughly vetted before being engaged by the ERC for their services. Compliance with applicable data protection legislation (including GDPR compliance) is included in the vetting requirements for all such suppliers. The collaboration with suppliers and the conditions of that collaboration are annually reviewed, including continued compliance with any applicable legal and regulatory requirements. Collaboration may be ceased when a supplier no longer meets such requirements.

To the extent permitted by applicable law, the Controller or the Processor may also disclose your personal data to the following parties:

- Governmental/regulatory authorities and law enforcement agencies.
- (Internal/external) auditors.
- In response to subpoenas, court orders, or other legal, regulatory or judiciary process; to establish or exercise the legal rights of the Controller or the Processor; to defend against legal claims; or as otherwise required by law or binding order.
- When the Controller or the Processor believes it is necessary to investigate, prevent, or take action regarding illegal activities; to protect and defend the rights, property, or safety of Processors, their users, or others.
- In connection with a corporate transaction, such as divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankrupt
- With affiliates of the Controller or the Processor.
- The Controller or the Processors may ONLY share aggregated or anonymous information with third parties, including partners, advertisers and investors.

3. What do we process and why?

Data is processed for the legal reason of the legitimate interests pursued by the ERC (art. 6, first subparagraph, point (f) GDPR regulation), as listed in the table.

During the design process of the applications, the Controller compiled a data inventory. We intend to acquire and process only the data that is strictly necessary for fulfilling the purposes described below. Attachment (3) lists the information that can be collected (non-exhaustive list^[2]), and their interests/purposes.

If you wish to consult the detailed data inventory or wish to acquire more information about the purpose of the data processing activities, please contact the DPO.

4. How long do we store personal data?

Default retention period

As required by applicable data protection legislation, the Controller strives to remove your personal data as soon as it is no longer necessary to accomplish the purpose for which it was originally collected. In view of this principle, the following retention periods apply (executed on an annual basis):

- Courses and certificates data: anonymisation 5 years after the expiry date of a certain qualification (is kept: country, appraisal result, year of birth, profession).
- Membership data: anonymisation 5 years after the last membership date (is kept: country, year of birth, profession)
- Accounting data: information older than 10 years is deleted.
- Personal data: anonymisation 5 years after last login (is kept: country, year of birth, profession, courses/certificates data (see above), membership data (see above)).
- Support questions: removal 2 years after closing support ticket.
- The data will be fully removed from the backups within 180 days after the backup.

5. How do we ensure security?

5.1. Security by design

The following security measures have been implemented to help protect personal data processed through our applications against unauthorized access, alteration, loss, or destruction (non-exhaustive list):

- All data is encrypted both at rest and in transit (check) between the service and your browser.
- Personal data is only accessible after logging in with a personal – unique – username and password.
- Passwords are not visible and are neither communicated via email, nor accessible to any person, including Processor's staff.
- All data is fully backed up.
- Our CoSy application offers two factor authentication support.
- Actions in your personal data are logged with the identity of the person performing the action, the time stamp and the IP address.
- For recipients having access to information they did not enter themselves, the two factor authentication is mandatory.
- We do not provide export facilities of user data to recipients; only Course Centres are capable of producing an export of course participants of a certain course with the purpose of shipping course manuals.

5.2. Personal data breach

In the case of a personal data breach that may be a risk to your rights and freedoms, the Controller shall also – within 72 hours after having become aware of it – notify the supervisory authority.

In case of a high risk – and without prejudice to the provisions of art. 34, paragraph 3 GDPR Regulation - the Controller will notify you about such personal data breach, with information about the nature, the likely consequences and a contact point for further information.

6. What are your rights as a Data Subject?

Unless your request is reasonably deemed excessive or unfounded, you may exercise the following rights in relation to your personal data processed through our applications:

- Request information concerning the processing of your personal data.
- Request the Controller to modify or correct your personal data if it is wrong.
- Have your personal data erased in certain circumstances as specified under applicable data protection legislation.
- Request the restriction of certain processing activities in certain circumstances as specified under applicable data protection legislation.
- Request a copy of all your data in possession of the Controller and the Processor in a standard format, as well as request for data portability.
- Withdraw your consent.

For a full review of your rights as Data Subject, please consult the [General Data Protection Regulation](#). You can easily exercise any of your rights by completing and submitting our online form.

The Controller reserves the right to charge a reasonable fee in case your request is deemed excessive at our sole discretion.

- 6.1. Modifying and correcting your personal data (rectification)
CoSy allows Data Subjects to manage the processed personal data themselves. If you are unable to complete the modifications or corrections to the data, then you can request the Controller to perform this action by submitting a request via the support widget in CoSy.
- 6.2. Removing your personal data
The following procedure will be applied when a request for removal of data from the Data Subject is presented to the ERC:
Because of the irreversibility of such action, in order to request a removal of personal data, the Data Subject must submit such request by logging in on CoSy and include a copy of their ID/Passport for identification purposes. The Controller may send an email reply first to check the authenticity of the request.
The Controller will assess without undue delay the nature of the request and check which data need to be removed from which database in accordance with the GDPR requirements.
If the personal data is present in the application, the Controller will remove the personal data from the database of the application/system and apply the anonymisation procedures within 30 calendar days following the personal data removal request. The Controller notifies (by email) the Data Subject about removal within 30 calendar days.
If the Controller cannot grant the request for removal, the DPO will notify the Data Subject about such decision and the motivation within 30 days following the data removal request.
All personal data that you have selected for deletion will be fully purged from the backups within 180 days.
WARNING: removing personal data may lead to irreversibly losing any personal link or trace of membership, trainings, certificates or qualifications. The controller however will keep a printed record of the request of removal for reasons of proof and Controller's liability. Such printed records will not be processed by automated means and neither in a filing system or with the intention to form part of a filing system, hence the GDPR regulation does not apply.
- 6.3. Apply restrictions of certain processing activities
A dedicated CoSy page in the Data Subject's account gives the possibility to subscribe or unsubscribe individually from the different newsletters, groups and other communication types. Changes made by the Data Subject are applied within one week at the latest.
Unsubscribing from emails containing news facts, event or services provided by the can alternatively be executed by using the unsubscribe button or hyperlink included in every newsletter or group email.
However, when registered for a course and until the course is closed administratively, identity and contact details are shared with the Course Centre. As a Course Centre cannot run a course without the possibility to contact the participants, this permission is mandatory in order to register for a course.
- 6.4. Receive a copy of all your data – data portability
Attachment (1) lists how a Data Subject can create an overview of all available data in the Controller's (Processor's) systems.
The Data Subject can apply for an export in an electronic format of his personal data and qualifications, for data portability purposes. The Controller is not responsible for the format of this data in order to be uploaded in other systems.

- 6.5. Withdraw your consent
You have the right to withdraw your consent at any time. However, such withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.
- 6.6. Lodge a complaint at a supervisory authority
In case you do not agree with decisions of the Controller or in other situations, you may lodge a complaint at the Belgian supervisory authority:
Gegevensbeschermingsautoriteit
Drukpersstraat 35
1000 Brussels
<https://www.privacycommission.be/en/contact-us>
commision@privacycommission.be
Or at the supervisory authority of your own country which can be found
on http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm
- 7. How you can provide consent?**
By accepting this privacy statement and furnishing personal data via CoSy, you expressly give consent to the Controller to process the data for the stated purposes.
Only upon your individual consent, the Controller will pass on specific personal data to third parties. The foregoing also applies to processing of personal data outside of the EU, both in countries or recognised and not recognised by the European Commission to offer adequate data protection. Where required, a data transfer agreement will be entered into, in accordance with the contractual clauses set out in EU Commission Decision C(2010)593 Standard Contractual Clauses (processors) for the purposes of Article 26(2) of Directive 95/46/EC).
- 8. Who can you contact?**
If you have any questions about this privacy policy, or if you want to exercise any of the Data Subject rights stipulated above, please contact the Controller via the support widget in CoSy.

Approved by the GPC on 17.05.2018