

## EIT Health UK-Ireland Privacy Policy

This policy describes how EIT Health UK-Ireland uses your personal information, how we protect your privacy, and your rights regarding your information. We promise to respect any of your information under our control and keep it safe. When we collect your information, we aim to be clear about what we will do with it.

As part of a public-private network organisation with relationships with partners, small organisations, experts and international colleagues, we use personal information to keep in touch, make our partners and contacts aware of opportunities and information, and report on progress to grant making bodies.

This policy is effective from 25<sup>th</sup> May 2018.

### **How we collect information:**

#### **Information you provide to us directly**

You may give us your information in order to sign up for one of our events, apply for funding, receive our information or otherwise communicate with us.

#### **Information you provide to us indirectly**

Your information may be shared with us by third parties, for example:

- EIT Health KIC LE;
- if you are a researcher or employee of a partner and your information is shared with us by the principal investigator or institution;
- if you sign up for an event organised by a partner that EIT Health has sponsored or organised.

You should check any privacy policy provided to you where you give your data to a third party.

## **Information from other sources**

We also use information from the following sources:

### **Social Media**

Depending on your settings or the privacy policies for social media and messaging services like Facebook or Twitter, you might give us permission to access information from those services, for example when you publicly tag us in an event photo.

### **Information available publicly**

We supplement information on public and professional contacts with information from publicly available sources such as charity websites and annual reviews, corporate websites, public social media accounts in order to create a fuller understanding of someone's interests and support of EIT Health.

## **What information we collect**

We collect, store and use the following kinds of personal information:

- your name;
- your contact details (including e-mail address and/or social media identity);
- if you apply for a job with us, information necessary for us to process these applications and assess your suitability (which may include things like employment status and previous experience);
- if you apply for EIT Health funding, information necessary to process your application, such as your employment and credentials;
- information about events, activities and products which we consider to be of interest to you; and
- any other personal information you provide to us.

Certain types of personal information are in a special category under data protection laws, as they are considered to be more sensitive. As a general principle, we do not collect and store this type of information.

## **How we use personal information**

We may use your personal information to:

- provide you with the services, opportunities or information you requested;
- keep a record of your relationship with us;
- respond to or fulfil any requests, complaints or queries you make to us;
- understand how we can improve our services, products or information by conducting analysis and market research;
- manage our events;
- check for updated contact details against third party sources so that we can stay in touch if you move (see “Keeping your information up to date” below);
- send you correspondence and communicate with you;
- fulfil our role in the projects funded by EIT Health KIC LE;
- perform data analysis, research, generate statistics and surveys related to our technical systems;
- testing our technical systems to make sure they are working;
- generate reports on our work, services and events;
- safeguard our staff;
- process your application for a job;
- audit and administer our accounts;
- meet our legal obligations, for instance to perform contracts between you and us, or our obligations to regulators, government and/or law enforcement bodies;
- establish, defend or enforce legal claims.

## **How we use your information to tell you about our work**

### **Sending marketing communications**

Our marketing communications include information about our activities and opportunities. Occasionally, we may include information from partner organisations or organisations who support us in these communications. We operate a legitimate interests policy. This means that we have a basis to use your personal information if it is reasonably necessary for us

(or others) to do so and in our/their legitimate interests (provided that what the information is used for is fair and does not unduly impact your rights).

We consider our legitimate interests to include all of the day-to-day activities EIT Health carries out with personal information, including the use of personal information (i.e. your name and your email address) to inform you about upcoming relevant EIT Health opportunities via email only. For more information, please see our section on “Legitimate interests” below. We may use information you have given us directly, for example the record of your previous relationship with us, as well as the type of activity you have been involved with, to tailor our communications with you about future activities.

### **Events**

When you have asked for details or registered for an EIT Health event, we will send you information about the activity.

### **Managing your contact preferences**

We make it easy for you to tell us how you want us to communicate. Our forms have clear marketing preference questions and we include information on how to opt out when we send you marketing. If you don't want to hear from us, you can change your preferences at any time. Just let us know when you provide your data or contact us on +44 (0)20 3865 1741 or [clc.uk-ireland@eithealth.eu](mailto:clc.uk-ireland@eithealth.eu).

If you don't want to be contacted for marketing purposes, we may still need to contact you for administrative purposes. This may include keeping in touch with you about applications you have submitted to EIT Health KIC LE or projects you are involved in.

### **Legal basis for processing**

Data protection laws mean that each use we make of personal information must have a legal basis. The relevant legal bases are set out in the General Data Protection Regulation (EU Regulation 2016/679) and in current UK data protection legislation.

### **Specific consent**

Consent is where we ask you if we can use your information in a certain way, and you agree to this. Where we use your information for a purpose based on consent, you may withdraw consent for future use of your information for this purpose at any time.

### **Legal obligation**

We have a basis to use your personal information where we need to do so to comply with a legal or regulatory obligation. For example, in some cases we may need to share your information with our various regulators or use information we collect about you for due diligence purposes.

### **Performance of a contract**

We have a basis to use your personal information where we are entering into a contract with you or performing our obligations under that contract. Examples of this would be if you are applying to work with us, applying for a grant from EIT Health KIC LE, or being funded to undertake an EIT Health project.

### **Vital interests**

We have a basis to use your personal information where it is necessary to protect life or health; for instance, if there were an emergency at one of our events that required us to share their information with emergency services.

### **Legitimate interests**

We have a basis to use your personal information if it is reasonably necessary for us (or others) to do so and in our/their legitimate interests (provided that what the information is used for is fair and does not unduly impact your rights).

We consider our legitimate interests to include all of the day-to-day activities EIT Health carries out with personal information. Some examples not mentioned under the other bases above where we are relying on legitimate interests are:

- use of personal information (i.e. your name and your email address) to inform you about upcoming relevant EIT Health opportunities via email only;
- use of personal information to administer, review and keep an internal record of the people we work with, including partners and other external stakeholders and;

- where you have registered for a third-party event sponsored by EIT Health, sharing personal information with the third-party event organiser so they can administer the event.

We only rely on legitimate interests where we consider that any potential impact on you and your rights under data protection laws do not override our (or others') interests in using your information in this way.

You may withdraw consent for future use of your information on the basis of legitimate interests at any time.

If we use sensitive personal information, we require an additional legal basis to do so under data protection laws, so will either do so on the basis of your explicit consent or another legal basis for using this type of information (for example if you have made the information manifestly public, we need to process it for employment, your vital interests, or, in some cases, if it is in the public interest for us to do so).

### **How we keep your information safe**

We ensure that there are appropriate technical and organisational controls (including physical, electronic and managerial measures) in place to protect your personal details.

### **How long we keep your information for**

EIT Health has specific criteria to determine how long we will retain your information, determined by legal and operational considerations.

### **Sharing your information with other organisations**

As set out in the "Sending marketing communications" section above, we will never sell or rent your information to third parties for marketing purposes. However, we may disclose your information to third parties in connection with the other purposes set out in this policy. These third parties may include:

- business partners, suppliers and sub-contractors who may process information on our behalf;
- researchers, partners, members of an advisory panel, funders of projects, and external members of our committees;
- analytics and search engine providers;
- IT service providers.

### **Keeping your information up to date**

We really appreciate it if you let us know if your contact details change, so we can keep your details up to date. We will also update your details if we hear about a change from a reliable third party (e.g. your host institution or a partner institution).

We're committed to putting you in control of your data and you're free at any time to opt out from this activity. To find out more, please contact +44 (0)20 3865 1741 or [clc.uk-ireland@eithealth.eu](mailto:clc.uk-ireland@eithealth.eu).

### **Your rights**

Under law, you have rights over personal information that we hold about you. We've summarised these below:

#### **Right to access your personal information**

You have a right to request access to the personal data that we hold about you. You also have the right to request a copy of the information we hold about you, and we will provide you with this unless legal exceptions apply.

If you want to access your information, send a description of the information you want to see by post to EIT Health UK-Ireland, 2 Eastbourne Terrace, London, W2 6LG or by email to [clc.uk-ireland@eithealth.eu](mailto:clc.uk-ireland@eithealth.eu).

### **Right to have your inaccurate personal information corrected**

You have the right to have inaccurate or incomplete information we hold about you corrected. If you believe the information we hold about you is inaccurate or incomplete, please provide us with details and we will investigate and, where applicable, correct any inaccuracies.

### **Right to restrict use of your personal information**

You have a right to ask us to restrict the processing of some or all of your personal information in the following situations: if some information we hold on you isn't right; we're not lawfully allowed to use it; you need us to retain your information in order for you to establish, exercise or defend a legal claim; or you believe your privacy rights outweigh our legitimate interests to use your information for a particular purpose and you have objected to us doing so.

### **Right to erasure of your personal information**

You may ask us to delete some or all of your personal information and in certain cases, and subject to certain exceptions, you have the right for this to be done.

### **Right for your personal information to be portable**

If we are processing your personal information (1) based on your consent, or in order to enter into or carry out a contract with you, and (2) the processing is being done by automated means, you may ask us to provide it to you or another service provider in a machine-readable format.

### **Right to object to the use of your personal information**

If we are processing your personal information based on our legitimate interests or for scientific/historical research or statistics, you have a right to object to our use of your information.

If we are processing your information to contact you with opportunities, and you wish to object, we will stop processing your information for these purposes as soon as possible.

If you want to exercise any of the above rights, please contact us on EIT Health UK-Ireland, 2 Eastbourne Terrace, London, W2 6LG or by email to [clc.uk-ireland@eithealth.eu](mailto:clc.uk-ireland@eithealth.eu). We may be required to ask for further information and/or evidence of identity. We will endeavour to respond fully to all requests within one month of receipt of your request, or if unable to, will contact you with reasons for the delay.

Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances. For more details we recommend you consult the guidance published by the UK's Information Commissioner's Office (ICO).

### **Right to complain**

If you are unhappy with any aspect of how we are using your personal information, please tell us about it, and we will do our best to learn and rectify the situation.

You also have the right to lodge a complaint about any use of your information with the Information Commissioners Office, the UK data protection regulator.

### **Changes to this policy**

We may change this Privacy Policy from time to time. If we make significant changes in the way we treat your personal information we will update this policy on our website or by contacting you directly.

### **Contact us**

If you have any questions, comments or suggestions, please let us know by contacting us at [clc.uk-ireland@eithealth.eu](mailto:clc.uk-ireland@eithealth.eu) or by phone on +44 (0)20 3865 1741.