

Privacy Policy

Center for Innovation in Medicine (ASOCIATIA CENTRUL PENTRU INOVATIE IN MEDICINA – INOMED)

Effective Date: XXXXX

Last Updated: XXXXX

1. Introduction

The Center for Innovation in Medicine ("INOMED", "Association", "we", "our", or "us") is committed to protecting the privacy and personal data of all individuals with whom we interact.

This Privacy Policy explains how we collect, use, disclose, store, and protect personal data in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR) and applicable Romanian data protection legislation.

This Policy applies to personal data processed through:

- The INOMED website (<https://ino-med.ro>);
- Microsoft 365 services, including Microsoft Teams, Microsoft Forms, SharePoint, Power Apps, Outlook, and related services;
- Research, education, communication, policy, and advocacy activities;
- Events, conferences, webinars, workshops, and training programs;
- Stakeholder engagement activities;
- Surveys and consultations;
- Funding, partnership, and project-management activities;
- Communications with INOMED.

2. Data Controller

The data controller responsible for the processing of your personal data is:

Center for Innovation in Medicine (Asociatia Centrul pentru Inovatie in Medicina - INOMED)

Address: 42 j Theodor Pallady Blvd., ap.1719, District 3, Bucharest, Romania

Email: office@ino-med.ro

Website: <https://ino-med.ro>

For data protection matters, please contact:

Data Protection Officer: Andreea Dinu, andreea.dinu@ino-med.ro

3. Principles governing Personal Data processing

INOMED processes personal data in accordance with the following GDPR principles:

- Lawfulness, fairness, and transparency;
- Purpose limitation;
- Data minimization;
- Accuracy;
- Storage limitation;
- Integrity and confidentiality;
- Accountability.

4. Categories of Personal Data we process

Depending on your interaction with INOMED, we may process the following categories of personal data:

Identification information

- Name and surname;
- Professional title;
- Organization or employer;
- Position or role.

Contact information

- Email address;
- Telephone number;
- Postal address.

Professional information

- Professional expertise;
- Institutional affiliation;
- Areas of interest;
- Participation in projects, events, or initiatives.

Communications

- Correspondence with INOMED;
- Responses to surveys and questionnaires;
- Feedback provided during consultations.

Event information

- Event registration details;
- Attendance records;

- Dietary requirements or accessibility needs voluntarily provided by participants.

Technical information

When using our websites or Microsoft 365 services, we may collect:

- IP address;
- Browser type and version;
- Device information;
- Authentication information;
- Login activity;
- Date and time of access;
- Usage and security logs.

Media materials

Where consent has been obtained or another lawful basis applies:

- Photographs;
- Audio recordings;
- Video recordings collected during events, conferences, workshops, or public activities.

5. Purposes of Processing

We process personal data for the following purposes:

Organizational and administrative activities

- Managing relationships with stakeholders;
- Responding to inquiries and requests;
- Administering projects and initiatives;
- Managing contracts and partnerships.

Events and educational activities

- Registration and participation management;
- Training and educational activities;
- Conference and workshop administration;
- Issuing certificates of participation.

Research and policy activities

- Conducting surveys and consultations;
- Stakeholder engagement;
- Research, analysis, and dissemination activities;
- Policy and advocacy initiatives.

Communications

- Sending newsletters and updates;
- Disseminating information about projects and events;
- Managing media relations.

Security and compliance

- Protecting systems and information assets;

- Detecting fraud, misuse, or security incidents;
- Ensuring compliance with legal obligations;
- Auditing and reporting.

6. Legal bases for processing

INOMED processes personal data on one or more of the following legal grounds under Article 6 GDPR:

Consent

Where you have provided explicit consent, including:

- Newsletter subscriptions;
- Optional surveys;
- Publication of photographs or recordings where required.

Contract

Where processing is necessary for:

- Event participation;
- Service provision;
- Partnership agreements;
- Project implementation.

Legal obligation

Where processing is necessary to comply with:

- Tax requirements;
- Accounting obligations;
- Funding and grant obligations;
- Regulatory requirements.

Legitimate interests

Where processing is necessary for legitimate interests pursued by INOMED, including:

- Stakeholder engagement;
- Network development;
- Project management;
- Organizational administration;
- Information security;
- Improvement of services and communications.

Whenever legitimate interests are relied upon, INOMED balances those interests against the rights and freedoms of affected individuals.

7. Microsoft 365 services

INOMED uses Microsoft 365 services, including:

- Microsoft Teams;
- Microsoft Forms;
- SharePoint Online;
- Power Apps;
- Outlook;
- OneDrive for Business;
- Other Microsoft cloud services as applicable.

These services may be used to:

- Facilitate collaboration and communication;
- Manage projects and events;
- Collect registrations and survey responses;
- Share information and resources;
- Manage stakeholder interactions.

When you access applications, forms, surveys, portals, or resources shared through Microsoft Teams or Microsoft 365, personal data and technical information may be processed, including:

- Name;
- Email address;
- User identifiers;
- Authentication information;
- Access logs;
- Device and browser information;
- IP address;
- Usage statistics.

Such processing is performed for operational, administrative, security, and compliance purposes.

Microsoft acts as a processor or sub-processor for certain processing activities carried out through Microsoft 365 services, subject to contractual and technical safeguards.

8. Cookies and website analytics

The INOMED website may use cookies or similar technologies to:

- Ensure website functionality;
- Improve user experience;
- Analyze website performance;
- Measure usage trends.

Where required by applicable law, consent will be obtained before placing non-essential cookies on your device. A separate Cookie Notice may be provided where appropriate.

9. Sharing of Personal Data

We may share personal data with:

Service Providers

Organizations providing:

- IT services;
- Hosting services;
- Communication platforms;
- Event management services;
- Administrative support services.

Project partners

Consortium partners, academic institutions, NGOs, healthcare organizations, public authorities, and other stakeholders involved in project implementation where necessary and lawful.

Funding bodies

European Commission agencies, public authorities, grant providers, auditors, and monitoring bodies where disclosure is required.

Legal and regulatory authorities

Where required by law, court order, regulatory requirement, or official request.

We do not sell personal data.

10. International transfers

Personal data may occasionally be transferred outside the European Economic Area (EEA).

Where such transfers occur, INOMED ensures appropriate safeguards are implemented, including:

- Adequacy decisions adopted by the European Commission;
- Standard Contractual Clauses (SCCs);
- Other legally recognized transfer mechanisms.

11. Data retention

INOMED retains personal data only for as long as necessary to fulfill the purposes for which it was collected, including:

- Project implementation periods;
- Contractual obligations;
- Funding and audit requirements;
- Legal retention requirements;
- Legitimate organizational needs.

When retention is no longer necessary, data will be securely deleted, anonymized, or archived in accordance with applicable laws and organizational policies.

12. Information security

INOMED implements appropriate technical and organizational measures to protect personal data, including:

- Access controls;
- Authentication mechanisms;
- Encryption where appropriate;
- Secure cloud services;
- Monitoring and audit logging;
- Staff awareness and confidentiality measures.

Despite these safeguards, no method of transmission or storage can be guaranteed to be completely secure.

13. Your GDPR Rights

Subject to applicable law, you have the right to:

- **Right of Access**

Request information about the personal data we hold about you.

- **Right to Rectification**

Request correction of inaccurate or incomplete personal data.

- **Right to Erasure**

Request deletion of personal data where applicable.

- **Right to Restriction**

Request limitation of processing under certain circumstances.

- **Right to Data Portability**

Receive your personal data in a structured, commonly used, machine-readable format where applicable.

- **Right to Object**

Object to processing based on legitimate interests.

- **Right to Withdraw Consent**

Where processing relies on consent, you may withdraw consent at any time.

Right to Lodge a Complaint

You have the right to lodge a complaint with the competent supervisory authority.

For Romania, the supervisory authority is:

National Supervisory Authority for Personal Data Processing (ANSPDCP)

Website: <https://www.dataprotection.ro>

14. Children's Data

INOMED does not knowingly collect personal data from children unless there is an appropriate legal basis, parental authorization where required, and suitable safeguards.

15. Automated Decision-Making

INOMED does not carry out solely automated decision-making or profiling producing legal or similarly significant effects on individuals unless explicitly informed otherwise.

16. Contact Us

For privacy-related questions or requests regarding your personal data, please contact:

Center for Innovation in Medicine (INOMED)

Email: office@ino-med.ro

Website: <https://ino-med.ro>

Requests relating to your GDPR rights will be handled in accordance with applicable legal requirements.

17. Changes to this Privacy Policy

INOMED may update this Privacy Policy periodically to reflect legal, operational, or technological developments. The latest version will always be published on our website and will indicate the date of the most recent revision.

If you have any questions regarding this Privacy Policy or the processing of your personal data, please contact us using the details provided above.