

INFORMATION NOTE
CONCERNING THE PROCESSING OF PERSONAL DATA
BY SURGICAL TRAINING INSTITUTE

1. ABOUT THIS INFORMATION NOTE

Foundation For Laparoscopic Thoracoscopic Surgery is a Romanian legal person, established in accordance with the provisions of the Government Ordinance no. 26/2000, with headquarters in Bucharest, headquarters in 85A Nicolae G. Caramfil str., district 1 Bucharest, registered with the Trade Register, sole registration code CIF 29231232, and hereinafter referred to as „STI”.

In this information note we will explain how your personal data is being processed by STI and how we ensure that your personal data is being processed responsibly and in accordance with the applicable legislation concerning personal data protection.

For the purposes of this information note, STI is a personal data operator. You can find below information about our identity and contact data.

We, at STI, and our partners, take very seriously the respect for your data. The compliance with the legislation concerning personal data protection and good practices in the field, as well as ensuring a climate of transparency, security and trust for our patients is a priority for us, for which our employees, collaborators, partners and management firmly state their support.

This note contains important information. So, we encourage you to take the time to read it thoroughly and carefully and make sure you fully understand it. In order to facilitate the reading of the document, we included a glossary explaining the main used terms (e.g., "personal data", "processing", etc.) at the end of this note. Do not hesitate to tell us any questions you might have. We want to make it clear to you how we use your data and how we protect it.

The content of this information note is purely informative and does not affect the rights granted to you by the legislation. We will do our best to facilitate for you their exercise.

2. WHO ARE WE

STI created as a stimulating and rewarding framework, aims to bring together medical elites in order to help support the development and professionalism of the healthcare services in Romania. It facilitates interdisciplinary interaction between physicians, thus contributing to the development and consolidation of some exceptional medical teams.

The main mission of STI is to support and reward the evolution of its members in an environment dedicated to the passion for medicine.

If you have any comments, suggestions, questions or concerns about any information in this note or about any other matter concerning the processing of your data by us, please do not hesitate to contact us at any time. Depending on your preferences, you can contact us through any of the communication channels below.

Our entire team will make all reasonable efforts to ensure that we give you an answer as quickly and completely as possible.

Our contact data

Complete name: [Surgical Training Institute]

Headquarters address: [85A Nicolae G. Caramfil str.]

Mailing address / E-mail address: [office@surgicaltraininginstitute.com]

3. WHICH OF YOUR DATA DO WE PROCESS

The personal data relating to you that we process will be the data obtained directly from you and include the following categories of data:

Personal details, such as: last name; first name; date of birth / age; citizenship; personal identification number (PIN); remaining information in your identity card (including series and number, issuance date, expiry date, place of birth).

Contact details, such as: residence / mailing address; mobile / fixed telephone number; e-mail address.

Payment details, such as: invoicing address; bank account number or bank card number / IBAN code; last name and first name of the holder of the bank account or bank card (may be other than you if someone else has paid an invoice in your name and for you); date from which the bank card is valid; expiry date of the bank card.

Professional details, such as: graduated institution, class, specialization, university degree

Opinions and views (may include sensitive data), such as: any opinions or views that you submit to us or any opinions and views that you publicly post about us on social media or that you make public on other public channels.

Data concerning purchases and interaction with us, such as: records of your interactions with us; details of the history of events organized by us.

4. SOURCE FROM WHICH WE RECEIVE YOUR DATA

We have the most information from you when you make an account on the site and you submit your application to join one of the events organized by us.

For this we continuously develop a campaign to update your data.

5. THE BASES ON WHICH WE PROCESS YOUR DATA

The bases on which we process your personal data

Considering the main mission of STI, namely to directly and indirectly support its members and associate physicians in their professional activities, we process your personal data in order to validate your registration as a member or, as the case may be, as a participant to the events organized by STI.

We may also process your data for the fulfillment of our archiving obligations, of the obligation to communicate to certain public authorities, upon request, certain information or of other legal obligations.

6. PURPOSES FOR WHICH WE PROCESS PERSONAL DATA RELATED TO YOU

The purposes for which we process personal data related to you are the following:

Ensuring access to a variety of modalities to develop and recognize physicians, special programs and perfecting training: STI gives physicians access to informal advices, following the training as specialists in various surgical and / or medical specializations; granting scholarships, study or perfecting trips to physicians; promoting and supporting initiatives and programs concerning the increase of quality of the medical act, as well as of the level of knowledge in the medical field, of any nature;

Participating to the events organized by us: Participating to the events organized by us is possible through registration at the organized scientific sessions, in accordance with the criteria specific to each event. Thus, your personal data will be processed for the management and issuance of certification documents concerning the participation and graduation of the organized training. We also mention that we will process your name and image as a result of your participation to the events organized by us, in order to promote them on our own site or on our Facebook page, only if you have explicitly agreed in this regard.

Communications concerning future congresses or other organized events: Communicating with you by any means (for example, e-mail, mobile or fixed telephone, telephone messages (SMS), mail, messages sent from social media platforms or in person) news concerning potential career development opportunities or other information that might interest you.

Fulfilling our legal obligations. Fulfilling our legal obligations with regard to archiving, healthcare, security, record keeping and other obligations that law imposes on us.

Financial management. Receiving payments from you including registering payments made by another person on your behalf; refunding some amounts of money to you; transmission of notifications; referral to court; preparation of financial / operational reports, activity reports and issuing financial statements / statements concerning contracts.

Settlement of disputes. Preparing requests and defenses before public authorities and other entities that settle disputes.

Surveys: Making surveys and asking questions to you in order to obtain your opinion concerning the events organized by us, identifying the potential problems concerning them in view of their improvement.

7. TO WHOM WILL WE DISCLOSE YOUR DATA

As a rule, we do not disclose your data to other companies, organizations or persons in any country (including Romania).

In certain circumstances, however, it is possible to disclose your data to other natural or legal persons.

Unfortunately, it is not possible to give you at this time precise information about the exact identity of all possible recipients of your data, because we have not set them up in advance for each member or participant. However, we try to be as transparent and specific as possible, and below we will present the categories of such recipients:

Public authorities in any field, in Romania or abroad (in particular public health authorities in Romania: Romanian College of Physicians, Ministry of Health and others) - at their request or at our initiative, in accordance with the applicable legislation.

Accountants, auditors, lawyers and other external professional consultants of ours – they will be bound by a law or by the contract concluded with us to maintain the confidentiality of your data.

Natural or legal persons acting as empowered persons for STI in various fields (for example, payment services, archiving or document destruction services, etc.) from anywhere in the world, that we will oblige to comply with the requirements of the legislation that protects your rights - they provide certain services to us.

Any relevant person, agency or court in Romania or other state – to the extent necessary to establish, exercise or defend a right of ours in front of a court.

Our partners, [online payment platform](#), with whom we are in contractual relations.

When we use a natural or legal person as person empowered to process your personal data, we will ensure that it has concluded a written act with us through which it undertakes, among other obligations that the personal data protection legislation provides, the obligations to (i) process personal data only in accordance with our written instructions that we have provided in advance and to (ii) effectively implement measures to protect confidentiality and ensure the security of personal data. We will also ensure that the written act between us and the empowered person provides for it at least all the other obligations provided by the applicable legislation concerning the protection of personal data.

8. TO WHOM AND IN WHAT CONDITIONS WILL WE TRANSFER YOUR DATA TO A THIRD COUNTRY OR INTERNATIONAL ORGANIZATION

At this time, we do not transfer or intend to transfer your personal data or part of it to other companies, organizations or persons in third states or to international organizations.

If it will be necessary to transfer your data to any of the above destinations, we will give you a new information note in advance concerning this issue.

9. HOW LONG WILL WE STORE YOUR DATA

We will store your data as long as it is necessary for the purposes of this information note. For storing your data (in electronic format), we use our own servers or the ones of other electronic archiving companies.

10. SECURITY OF YOUR DATA

We work hard to protect our members, other persons whose data we process and ourselves against unauthorized access, and unauthorized modification, disclosure, or destruction of the data we process.

In particular, we have implemented the following technical and organizational measures to ensure the security of personal data:

Dedicated policies. We adopt and review our data processing practices and policies for our members and other persons, including physical and electronic security measures, to protect our systems against unauthorized access and other possible security threats. We constantly check how we apply our own data protection policies and how we comply with data protection legislation.

Data minimization. We have ensured that your personal data that we process are limited to those that are necessary, appropriate and relevant to the purposes stated in this note.

Restricted access to data. We strictly restrict the access to personal data that we process to the

employees, collaborators, and other persons who need to access them in order to process them for us. All these companies and natural persons are subject to strict confidentiality obligations and we will not hesitate to hold them responsible and stop working with them if they do not treat the protection of your and others' data with the utmost seriousness.

Specific technical measures. We use technologies to ensure our members and other persons that their data security is protected.

Back-ups and security audits. We work hard to protect our systems from access or accidental or unauthorized modification of your data and from other possible threats to their security. All the technical equipment that we use to process your data is secured and updated to protect the data. We also perform, on a regular basis, security audits on the computer systems that we use to process the personal data of our clients and of other persons.

Ensuring the accuracy of your data. It is possible that from time to time we ask you to confirm the accuracy and / or actuality of the personal data related to you that we are processing.

Training of the personnel. We constantly train and test our employees and collaborators concerning the legislation and best practices in the field of personal data processing.

Anonymisation of data. Where possible and appropriate to our work, we anonymize / pseudoanonymize the personal data that we process, so that we can no longer identify the persons they are referring to.

Control of our service providers. We insert into the contracts concluded with those who process for us (authorized persons) or with us (other operators - associated operators) provisions to ensure the protection of the data we process; this protection goes at least to the minimum required by the legislation.

Although we take all the reasonable measures to ensure the security of your data, STI cannot guarantee the absence of any security breach or failure to penetrate the security systems. In the unfortunate and unlikely event that such a breach occurs, we will follow the legal procedures to limit the effects and to inform the data subjects.

11. WHICH ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM

We treat your rights in relation to the processing that we perform on your data with utmost seriousness. We will continue to take all reasonable measures to ensure that they are respected.

Your rights

Briefly, your rights are the following:

Right of access to data. You have the right to obtain the access to your data that we process or control, or to the copies thereof; you also have the right to obtain from us information about the nature, processing and disclosure of such data.

Right to data rectification. You have the right to obtain the rectification of inaccuracies of your data that we process or control.

Right to data deletion („right to be forgotten“). You have the right to obtain from us the deletion of your data that we process or control.

Right to restrict data processing. You have the right to restrict the processing of your data that we process or control.

Right to object. You have the right to object to the processing of your data by us or on our behalf.

Right to data portability. You have the right to obtain the transfer to another operator of your data that we process or control.

Right to withdraw the consent. In cases where we process your data under your consent, you have the right to withdraw your consent; you can do it at any time, at least as easy as giving us your initial consent; withdrawing the consent will not affect the lawfulness of processing your data that we performed before withdrawing.

Right to submit a complaint to the supervisory authority. You have the right to submit a complaint to the personal data processing supervisory authority about the processing of your data by us or on our behalf.

How can you exercise your rights

In order to exercise one or more of these rights (including the right to withdraw your consent, when we process your data based on it) or to ask any question about any of these rights or about any provision in this information note or about any other aspects of processing your data by us, please use whenever you want the contact details in section 2 above (our Contact data).

We will try to answer as quickly and completely as possible to all your questions and concerns and to facilitate the exercise of your rights.

12. WHAT CAN HAPPEN IF YOU DON'T PROVIDE US WITH YOUR DATA

You don't have an obligation to provide us with your personal data that we mentioned in this document. However, if you don't provide us with the data mentioned in this information note, it will not be possible for us to ensure your access to the events to which you want to participate.

13. NON-EXISTENCE OF AN AUTOMATIC DECISION-MAKING PROCESS

Our respect for your data includes the fact that we give them the necessary human attention, through our personnel. Under the current circumstances, as a participant to the events organized by us, you will not be subject to our decision based solely on the automatic processing of your data (including the creation of profiles) to produce legal effects with respect to you or affect you similarly to a significant extent.

14. WHEN THIS INFORMATION NOTE WILL BE APPLIED

This information note applies in relation to the activity performed by STI in order to achieve the purpose for which it was established.

This note does not apply to the services or products provided by other companies or natural persons, including the ones provided by STI partners, posted on our websites or about which we inform you in another way.

15. MODIFICATIONS OF THIS INFORMATION NOTE

We may modify this note from time to time. In such cases, we will inform you in advance and we will not reduce your rights concerning your data through the modifications that we might make to this note.

We will also post this information note on our website, at the following link: [<https://www.surgicaltraininginstitute.com>.] We will also keep all the previous versions of this note in an archive on our website, so that you can consult them at any time.

16. WHAT DO THE TERMS WE HAVE USED IN THIS NOTE MEAN

Supervisory authority for the processing of personal data: an independent public authority which, according to the law, has duties related to the supervision of compliance with the legislation concerning personal data protection. In Romania, this supervisory authority for the processing of personal data is the National Authority for Personal Data Processing Supervision (ANSPDCP).

Personal data: any information relating to an identified or identifiable natural person (the "data subject"). A natural person is identifiable if it can be identified, directly or indirectly, in particular by reference to an identification element, for example: name, identification number, location data, *online* identifier, one / more elements specific to the physical, physiological, genetic, psychological, economic, cultural or social identity of that person.

Medical data (sensitive personal data), such as: previous diseases, administered treatment, including data about your family's medical history; other information that you provide us about your family members and your kinship relationships.

Operator: natural or legal person who decides why (for what purpose) and how (by what means) personal data are processed. According to the law, the responsibility for complying with the legislation concerning personal data rests primarily with the operator. In the relationship with you, we are the operator and you are the data subject.

Empowered person: any natural or legal person who processes personal data on behalf of the operator, other than the operator's employees.

Data subject: natural person to whom certain personal data refer (to whom they „belong”). In the relationship with us (the operator), you are the data subject.

Processing of personal data: any operation / set of operations performed on personal data or on sets of personal data, with or without the use of automated means; for example: collecting, recording, organizing, structuring, storing, adapting or modifying, extracting, consulting, using, disclosing by transmitting, disseminating or making available in any other way, aligning or combining, restricting, deleting or destructing such personal data / sets of personal data. These are just examples. Practically, processing means any operation on personal data, whether by automatic or manual means.

Third state: a state outside the European Union and the European Economic Area.