

## Politica de Confidențialitate

### Societatea Studenților Mediciniști Iași

SOCIETATEA STUDENȚILOR MEDICINIȘTI IAȘI, cu sediul în Iași, str. Universității nr. 16, înregistrată ca persoană juridică prin Sentința Juridică nr. 125 din 04.04.1990, cu codul fiscal nr. 8740489, în calitate de autor, proprietar și administrator al site-urilor: [ssmi.ro](http://ssmi.ro), [intern.ssmi.ro](http://intern.ssmi.ro), [simulare-rezidentiat.ssmi.ro](http://simulare-rezidentiat.ssmi.ro), [simulare-admitere.ssmi.ro](http://simulare-admitere.ssmi.ro), [platforma-simulare.ssmi.ro](http://platforma-simulare.ssmi.ro), [congressis.ro](http://congressis.ro) și [registration.congressis.ro](http://registration.congressis.ro), precum și în calitate de operator<sup>[1]</sup>, respectă dreptul la viața privată al persoanelor, iar în contextul prelucrării datelor cu caracter personal ale acestora (DCP), le asigură o protecție adecvată.

În cadrul raporturilor cu terțe persoane, SSMI pune la dispoziția celor interesați, următoarele date de contact: sediul nostru principal este situat pe str. Universității nr. 16, Iași, e-mail: [contact@ssmi.ro](mailto:contact@ssmi.ro); [presedinte@ssmi.ro](mailto:presedinte@ssmi.ro);

Temeiul legal al prelucrării DCP care se efectuează de către SSMI:

- Constituția României, republicată (art. 26);
- Următoarele legi cu modificările, completările și reglementările lor ulterioare și subsecvente:
  - o Legea nr. 31/1990 privind societățile comerciale;
  - o Legea 287/2009 din 17 iulie 2009 privind Codul Civil;
  - o Legea nr. 134/2010 privind Noul Cod de Procedură Civilă;
  - o Legea nr. 677/2001, cu modificările și completările ulterioare;
  - o REGULAMENTUL (UE) 2016/679 din 27 aprilie 2016 (GDPR) privind protecția persoanelor fizice în ceea ce privește prelucrarea datelor cu caracter personal și privind libera circulație a acestor date;
  - o Legea nr. 190/2018 privind aplicarea GDPR în România.

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[1] Operator: Orice persoană fizică sau juridică, de drept privat ori de drept public, inclusiv autoritățile publice, instituțiile și structurile teritoriale ale acestora, care stabilește scopul și mijloacele de prelucrare a datelor cu caracter personal.

[2] Prelucrarea datelor cu caracter personal reprezintă orice operațiune sau set de operațiuni care se efectuează asupra datelor cu caracter personal, prin mijloace automate sau neautomate, cum ar fi colectarea, înregistrarea, organizarea, stocarea (pe orice fel de suport), adaptarea ori modificarea, extragerea, consultarea, utilizarea, dezvăluirea către terți prin transmitere, diseminare sau în orice alt mod, alăturarea ori combinarea, blocarea, ștergerea sau distrugerea.

## **Ce sunt Datele cu Caracter Personal (DCP)?**

Conform Regulamentului (UE) 2016/679 (Regulamentul General privind Protecția Datelor – GDPR) care a intrat în vigoare la data de 25 mai 2018: datele cu caracter personal sunt orice informații care se referă la o persoană fizică identificată sau identificabilă. Informațiile diferite care, adunate, pot duce la identificarea unei anumite persoane constituie și ele date cu caracter personal.

Exemple de date cu caracter personal: numele și prenumele, adresa de domiciliu, adresa de e-mail, seria și numărul unui act de identitate, adresa de protocol de internet (IP).

## **Ce date cu caracter personal prelucrăm?**

DCP pe care ni le furnizați și pe care le prelucrăm prin intermediul formularelor disponibile pe acest website sunt: nume, prenume, companie, adresa de e-mail și nr.de telefon. Pentru anumite scopuri ulterioare, precum cel legat de perfectarea unui eventual contract de prestări servicii, suplimentar pot fi prelucrate și alte date personale, respectiv: domiciliul/reședința legală, date privind BI/CI (serie și număr, emitent, data eliberării), CNP.

Scopul prelucrării<sup>[2]</sup>:

- comunicarea, informarea, transmiterea de noutăți referitoare la domeniul sănătății și educației medicale;
- soluționarea diferitelor cereri/întrebări/sesizări/plângeri formulate de către persoanele interesate/ vizate;
- pentru executarea unui contract la care persoana vizată este parte;
- realizarea unui/unor interese legitime ale operatorului (ex.: în scopul constatării, exercitării sau apărării unui drept în justiție, în scopuri administrative interne, pentru facturarea și încasarea serviciilor prestate);
- pentru a vă informa cu privire la ofertele promoționale, noutățile despre activitățile noastre sau pentru a vă invita la evenimentele noastre.

SSMI mai poate folosi datele statistice sau datele anonime rezultate în urma prelucrării DCP, în următoarele scopuri:

- realizarea de rapoarte / analize;
- realizarea de informări;
- publicarea, promovarea, ofertarea activităților;
- pentru creșterea calității oferite.

## **Condiții de legitimitate privind prelucrarea datelor personale:**

Datele dumneavoastră personale vor fi prelucrate exclusiv în baza consimțământului acordat în mod expres și neechivoc pentru această prelucrare.

Site-ul nu prelucrează datele personale ale minorilor.

În situația în care considerați că ați fost corect informat/informată iar totodată sunteți de acord cu mențiunile și scopurile de mai sus, vă rugăm să bifați opțiunile corespunzătoare de pe site.

Dacă nu doriți/nu sunteți de acord ca datele dumneavoastră să facă obiectul prelucrării, vă rugăm să nu ni le furnizați.

Retragerea ulterioară a acordului/consimțământului prelucrării datelor dumneavoastră personale este posibilă oricând pe durata colaborării, având ca efect încetarea operațiunilor specifice, precum și a colaborării. Retragerea consimțământului nu afectează legalitatea prelucrării efectuate pe baza consimțământului exprimat înainte de retragerea acestuia.

Datele dumneavoastră personale vor fi stocate pe toată perioada colaborării cât și ulterior acesteia, pe o perioadă de cel mult 3 ani de la data încetării colaborării, după care vor fi șterse sau anonimizate, după caz.

Dacă ne furnizați datele dumneavoastră personale în calitate de Alumni SSMI, pentru introducerea lor în Baza de Date Alumni SSMI, sunteți de acord cu stocarea acestora pe o perioadă de până la 5 ani de la încetarea colaborării, cu posibilitatea prelungirii perioadei numai cu acordul părților. Aceste date vor fi prelucrate doar pentru a facilita comunicarea și a întreține colaborarea pe viitor.

### **Către cine transmitem DCP?**

În considerarea obiectului de activitate/intereselor legitime ale operatorului, DCP pot fi diseminate și puse la dispoziția Oficialilor SSMI (membrilor Consiliului Director, coordonatorii de departamente, directorii de divizii, adjuncții acestora și coordonatorii de proiecte SSMI) doar pe perioada mandatului de 1 an.

DCP pot fi diseminate către instituțiile abilitate ale statului, conform legii, fără consimțământul persoanelor vizate, în cazul unor eventuale litigii sau constatării unor fraude.

### **Cum protejăm DCP?**

Datele personale sunt prelucrate în condiții de siguranță – SSMI depune toate eforturile rezonabile pentru a proteja DCP prelucrate de noi și a procedat la implementarea de măsuri tehnice și organizatorice adecvate privind securitatea datelor, împotriva prelucrării sau a alterării neautorizate, împotriva pierderii sau a distrugerii, precum și împotriva dezvăluirii și a accesului neautorizat la datele personale transmise, stocate sau prelucrate. SSMI asigură integritatea, disponibilitatea, confidențialitatea și autenticitatea în ceea ce privește datele cu caracter personal, utilizând proceduri de lucru pentru a proteja prelucrarea datelor cu caracter personal, conform prevederilor legale în vigoare.

În situații de încălcare a securității datelor care v-ar putea pune în pericol datele personale, ne angajăm să vă informăm prompt despre aceste situații și să luăm măsurile prevăzute de lege.

## Privacy policy

### Medical Students' Society Iași

The MEDICAL STUDENTS' SOCIETY IAȘI, based in Romania, Iași, str. Universității no. 16, registered as a legal entity by Legal Sentence no. 125 of 04.04.1990, with the fiscal code no. 8740489, as author, owner and administrator of the sites: [ssmi.ro](http://ssmi.ro), [intern.ssmi.ro](http://intern.ssmi.ro), [simulare-rezidentiat.ssmi.ro](http://simulare-rezidentiat.ssmi.ro), [simulare-admitere.ssmi.ro](http://simulare-admitere.ssmi.ro), [platforma-simulare.ssmi.ro](http://platforma-simulare.ssmi.ro), [orientation.ssmi.ro](http://orientation.ssmi.ro), [congressis.ro](http://congressis.ro) and [registration.congressis.ro](http://registration.congressis.ro), as well as as an operator<sup>[1]</sup>, respects the right to privacy of individuals, and in the context of the processing of their personal data, provides them with adequate protection.

In relations with third parties, SSMI makes available to those interested, the following contact details: our main office is located on str. Universității no. 16, Iași, Romania, e-mail: [contact@ssmi.ro](mailto:contact@ssmi.ro) and [presedinte@ssmi.ro](mailto:presedinte@ssmi.ro).

Legal basis for the processing of personal data carried out by SSMI:

- Romanian Constitution, republished (art. 26);
- The following laws with subsequent amendments, completions and regulations:
  - o Law no. 31/1990 regarding the commercial companies;
  - o Law 287/2009 of July 17, 2009 on the Civil Code;
  - o Law no. 134/2010 on the New Code of Civil Procedure;
  - o Law no. 677/2001, with subsequent amendments and completions;
  - o (EU) REGULATION 2016/679 of 27 April 2016 (GDPR) on the protection of individuals with regard to the processing of personal data and on the free movement of such data;
  - o Law no. 190/2018 regarding the application of GDPR in Romania.

#### What is Personal Data?

According to (EU) Regulation 2016/679 (General Data Protection Regulation - GDPR) which entered into force on 25 May 2018: personal data is any

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[1] Operator: Any natural or legal person, whether private or public, including public authorities, institutions and their territorial structures, which sets out the purpose and means of the processing of personal data.

[2] The processing of personal data means any operation or set of operations that is performed on personal data, by automatic or non-automatic means, such as collection, registration, organization, storage (on any medium), adaptation or modification, extraction, consulting, using, disclosing to third parties by transmission, dissemination or in any other way, joining or combining, blocking, deleting or destroying.

information relating to an identified or identifiable natural person. The different information that, when collected, can lead to the identification of a certain person also constitute personal data.

Examples of personal data: name and surname, home address, e-mail address, serial number and number of an identity document, internet protocol (IP) address.

### **What personal data do we process?**

The personal data that you provide us and that we process through the forms available on this website are: name, surname, company, e-mail address and telephone number. For certain subsequent purposes, such as the one related to the conclusion of a possible service contract, other personal data can be additionally processed, respectively: domicile/legal residence, data on ID (series and number, issuer, date of issue), CNP.

Purpose of processing<sup>[2]</sup>:

- communication, information, and transmission of news in the field of health and medical education;
- resolving various requests/questions/notifications/complaints made by interested/ targeted persons;
- for the execution of a contract to which the data subject is a party;
- the realization of a/ some legitimate interests of the operator (eg.: for the purpose of ascertaining, exercising or defending a right in court, for internal administrative purposes, for the invoicing and collection of the services provided);
- to inform you about promotional offers, news about our activities or to invite you to our events.

SSMI may also use statistical data or anonymous data resulting from the processing of personal data, for the following purposes:

- making reports/analyses;
- making notices;
- publishing, promoting, offering activities;
- to increase the quality offered.

### **Conditions of legitimacy regarding the processing of personal data:**

Your personal data will be processed exclusively on the basis of the express and unequivocal consent given to this processing.

The site does not process the personal data of minors.

If you consider that you have been correctly informed and at the same time you agree with the above statements and purposes, please check the appropriate options on the site.

If you do not want/agree to your data being processed, please do not provide it to us.

Subsequent withdrawal of the agreement/consent to the processing of your personal data is possible at any time during the collaboration, with the effect of the termination of specific operations, as well as the collaboration. Withdrawal of consent does not affect the lawfulness of the processing carried out on the basis of the consent expressed before its withdrawal.

Your personal data will be stored throughout the collaboration and after it, for a period of up to 3 years from the date of termination of the collaboration, after which they will be deleted or anonymized, as appropriate.

If you provide us with your personal data as SSMI Alumni, for their entry in the SSMI Alumni Database, you agree to their storage for a period of up to 5 years from the end of the collaboration, with the possibility of extending the period only with the agreement of the parties. This data will only be processed to facilitate communication and maintain future collaboration.

### **To whom do we transmit personal data?**

In view of the operator's object of activity/legitimate interests, personal data may be disseminated and made available to SSMI Officials (members of the Board of Directors, department coordinators, division directors, their deputies and SSMI project coordinators) only during the term of office of 1 year.

Personal data may be disseminated to the competent state institutions, according to the law, without the consent of the data subjects, in case of possible litigation or fraud.

### **How do we protect personal data?**

Your personal data is processed securely – SSMI shall make all reasonable efforts to protect the personal data we process and to implement appropriate technical and organizational measures regarding data security, against unauthorized processing or alteration, against loss or destruction, and against disclosure and access, unauthorized access to personal data transmitted, stored or processed. SSMI ensures the integrity, availability, confidentiality and authenticity of personal data, using working procedures to protect the processing of personal data, in accordance with the legal provisions in force.

In situations of data security breaches that could endanger your personal data, we undertake to inform you promptly about these situations and to take the measures provided by law.



## Privacy policy

### Medical Students' Society Iași

The **Medical Students' Society Iași** respects your privacy and is committed to protecting your personal data.

This privacy notice will inform you as to how and why we collect, use and share your personal data and will tell you about your privacy rights, how the law protects you and how to contact us.

#### **Purpose of this privacy notice**

This privacy notice applies when you provide your personal data to SSMI, whether if that's because you are using our websites ([www.ssmi.ro](http://www.ssmi.ro), [www.congressis.ro](http://www.congressis.ro)) or providing the data in other ways such as Google Forms or via E-mail. Our website and products and services are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

#### **Controller**

The **Medical Students' Society Iași** is the controller and responsible for your personal data (collectively referred to as "**SSMI**", "**we**", "**us**" or "**our**" in this privacy notice). We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, please contact the DPO using the details set out below.

#### **Contact details**

Our registered office is Strada Universității, Nr. 16, Iași, Romania.

If you have any queries relating to how we use your information please contact our DPO:

- Name: Băisan Răzvan-Ioan
- Address: strada Universității, Nr. 16, Iași, Romania
- tel: +40773980589
- [presedinte@ssmi.ro](mailto:presedinte@ssmi.ro)

You have the right to make a complaint at any time to the National Authority for Surveillance and Processing of Personal Data (NASPD), the Romanian supervisory authority for data protection issues (<https://www.dataprotection.ro/>). We would, however, appreciate the chance to deal with your concerns before you approach the NASPD so please contact our DPO in the first instance.

### **Changes to the privacy notice and your duty to inform us of changes**

This version was last updated on 31<sup>st</sup> of December 2023. From time to time, we may change our privacy notice. We will post a notice on our website to notify you of any significant changes or update you by other appropriate means.

### **Third-party links**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit (for example to see how they use your information and to find out how to opt out, or delete such information).

### **The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** - includes first name, maiden name, last name, title, date of birth and gender.
- **Contact Data** - includes postal and billing address, email address, telephone number and photos where you have agreed to provide this such as when participating at a conference.
- **Financial Data** - includes bank account and payment details.
- **Transaction Data** - includes details about payments to and from you and other details of products and services you have purchased and used from us.
- **Technical Data** - includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** - includes your **Congressis** ID and password, preferences, feedback, survey responses and opinions.

- **Usage Data** - includes information about how you use our website, member benefits, products and services, attendance at events or conferences.
- **Marketing and Communications Data** - includes your preferences in receiving marketing and membership communications from us.
- **Alumni Membership Data** - it may include employment status (employed, not employed, self-employed and etcetera), professional categories (branch of practices, grades and specialities) along with workplace(s), employer(s), start and end date.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Sensitive personal information (also known as **Special Categories of Personal Data**) is information which relates, for example, to your health, sexual orientation, race or religion. We may obtain sensitive personal information about you if you volunteer it during any of your contact with us.

We have additional obligations to treat sensitive personal information with appropriate care, taking into account the nature of that information. The best way to restrict the processing of your sensitive personal data is not to give it to us unless it is necessary for the services you are obtaining from us.

The information you provide to us is confidential and protected by law. The confidentiality of personal information is a top priority for SSMI. Your personal information is not shared with any external organisation, government department, local council, or marketing company. The information collected will be used solely to produce statistics and for statistical research. Analysis of the data will be in aggregate form and will not be used in any way that allows individuals to be identified.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **How your personal data is collected**

We use different methods to collect data from and about you including through:

- **Direct interactions**

You may give us your Identity, Contact and Financial Data and the Special Categories

of Data mentioned above by filling in forms or by corresponding with us by post, phone, email or otherwise.

This includes, for example, personal data you provide when you:

- o contact us (including when you use our social tools such as the chat bot);
  - o request marketing to be sent to you;
  - o enter a competition, promotion or survey;
  - o give us some feedback.
- **Automated technologies or interactions**

As you interact with our website, we may automatically collect Technical Data about

your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

### **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- When we need to contact you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other as we do not provide your data to a third party who may send direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting our DPO: tel: +40773980589 , [presedinte@ssmi.ro](mailto:presedinte@ssmi.ro).

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of the ways we use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Please contact our DPO: tel: +40773980589, [presedinte@ssmi.ro](mailto:presedinte@ssmi.ro) if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose / Activity	Legal basis for processing
<p>Membership administration such as: registering you as a <b>Congressis</b> participant;</p> <ul style="list-style-type: none"> <li>• processing your registration including: managing payments, fees and charges, collecting and recovering money owed to us;</li> <li>• holding your data on our membership database;</li> <li>• management and statistical analysis of our membership;</li> <li>• confirming your identity when you contact us;</li> <li>• contacting you about your membership.</li> </ul>	<p>a. Performance of a contract with you  b. In our legitimate interests  c. In the course of our legitimate activities</p>
<p>Sharing your personal data within the <b>Congressis</b>.</p>	<p>Some of your personal data will be available to <b>Congressis's</b> staff, <b>Congressis</b> organising committee members and elected officials .</p>
<p>To provide you with information and services that you request from us.</p>	<p>a. It is in our legitimate interests and  b. in the course of our legitimate activities - to respond to your queries and provide any information requested in order to generate and develop business. To ensure we offer a good and responsive service, we consider this use to be proportionate and will not be prejudicial or detrimental to you.</p>
<p>To send you alerts, newsletters, bulletins, announcements, and other communications concerning the <b>Congressis</b> or which we believe may be of interest to you</p>	<p>a. It is in our legitimate interests and  b. in the course of our legitimate activities to market our services. We consider this use to be proportionate and will not be prejudicial or detrimental to you. You can always opt-out of receiving direct marketing related email communications or text messages by following the unsubscribe link.</p>

<p>To invite you to events or other conferences we believe may be of interest to you.</p>	<p>It is in our legitimate interests and in the course of our legitimate activities to market our services. We consider this use to be proportionate and will not be prejudicial or detrimental to you. You can always opt-out of receiving direct marketing-related email communications or text messages by following the unsubscribe link.</p>
<p>To use data analytics to improve our website, products/services, marketing, member relationships and experiences</p>	<p>a. It is in our legitimate interests and b. in the course of our legitimate activities (to define types of members for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about products or services that may be of interest to you</p>	<p>a. It is in our legitimate interests and b. in the course of our legitimate activities (to develop our products / services and grow our business)</p>

### Third-party marketing

We will not share your data outside the **Congressis** for marketing purposes without your consent.

### Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

### Data security

We understand that the security of your information is important to you. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We use industry standard physical and procedural security measures to protect information from the point of collection to the point of destruction. This includes encryption, firewalls, access controls, policies and other

procedures to protect information from unauthorized access. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

## **Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

The criteria we use for retaining different types of personal data, includes the following:

- General queries - when you make an enquiry or contact us by post, email or telephone, we will retain your information for as long as necessary to respond to your queries. After this period, we will not hold your personal data for longer than one (1) year if we have not had any active subsequent contact with you.
- Legal and regulatory requirements - we may need to retain personal data for up to seven (7) years after we cease providing services and products to you, where necessary, to comply with our legal obligations, resolve disputes or enforce our terms and conditions.

Specific examples include:

- Membership records - we retain a record of your membership for seven (7) years after your membership ends or lapses for any reason.
- Website use - data relating to your activity is retained for two (2) years after last accessing.

In some circumstances you can ask us to delete your data: see 'request erasure' below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **Your legal rights**

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- (a) if you want us to establish the data's accuracy;
- (b) where our use of the data is unlawful but you do not want us to erase it;
- (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims;
- (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we

may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact the DPO:

SSMI Data Protection Officer:

- Name: Băisan Răzvan-Ioan
- Address: strada Universității, Nr. 16, Iași, Romania
- tel: +40773980589
- [presedinte@ssmi.ro](mailto:presedinte@ssmi.ro)

You have the right to make a complaint at any time to the National Authority for Surveillance and Processing of Personal Data (NASPD), the Romanian supervisory authority for data protection issues (<https://www.dataprotection.ro/>). We would appreciate the chance to deal with your concerns before you approach the NASPD so please contact our DPO in the first instance.

### **No fee is usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.