

CENTER FOR PREVENTIVE PAEDIATRICS "AMERICOS ARGYRIOU"			
TITLE: PRIVACY POLICY			
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Introduction

The Center for Preventive Paediatrics "Americos Argyriou" (hereafter referred to as "**The Center**") is a registered charity and is active in the sphere of preventive paediatrics. For the Center's Services, you can visit the Center's website at www.cpp.org.cy.

The protection of the personal data of our customers and our associates is of paramount importance to The Center. We take appropriate measures to protect personal data and ensure that personal data are processed in accordance with the applicable national law and the European General Data Protection Regulation 2016/679 (hereafter "The Regulation").

Collection of Personal Data and Purpose of Processing

The Center collects, processes and maintains personal data for the provision of its services. The personal data you provide us such as your name, date of birth, gender, contact details (address, e-mail, phone / mobile phone), biological samples and health data are processed within the scope of our activities.

Your personal data may be collected by you personally or by third parties on your behalf (e.g. gynaecologists, paediatricians).

The legitimate reasons for processing your personal data are:

- The provision of the services you assign to us
- Compliance with an obligation imposed by law
- Safeguarding and protecting the legitimate interests of both you and the Center
- Any consent you provide under certain conditions set by the legal framework in order to receive information about the services provided by the Center.
- The processing necessary to run the screening programs offered by the Center. If the processing is performed for other purposes, then your explicit consent is requested i.e. the case of a patient participating in a clinical study.
- Exceptionally, your data is used when needed to identify, exercise or defend a right in cases involving medical liability and healthcare in general. In such cases the data subjects are informed prior to using their data before the court for such processing.

Where we transfer the data

The Center transfers personal data to third parties to whom the Center assigns the processing of personal data on its behalf. In these cases the Center remains responsible for the processing of your personal data and sets out the details of the processing, signing a specific agreement with the third parties to whom it assigns processing activities in order to ensure

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that the processing is carried out in accordance with the applicable legislation and that any person may freely and without hindrance exercise his/her rights.

Access to Personal Data

Exclusively only staff members have access to customer personal data as well as examination data. Each member of staff of the Center signs an Ethics Code and receives special training in relevant procedures for collecting, processing and maintaining personal data. It is understood that the Ethics Code includes unconditional compliance with this privacy policy during employment and thereafter. Each associate of the Center is required to comply with the Center's Privacy Policy during the period of collaboration and thereafter.

By way of exception, access to personal data is allowed:

- to the judicial and prosecuting authorities in the performance of their duties
- to other state bodies which, by virtue of their statutes, have such a right and authority.

Retention Period

The period of storage and retention of data is decided on the basis of the following specific criteria, as appropriate:

- When processing is performed on a contractual basis, your personal data will be stored for as long as necessary for the performance of the contract and for the foundation, exercise, and/or support of legal claims under the contract.
- When processing is required as a requirement under provisions of the applicable legal framework, your personal data will be stored for as long as required by the relevant provisions. In particular, and in accordance with a directive issued by the Personal Data Commissioner, the retention period in a filing system of personal data relating to the health of the data subject should not exceed 15 years after his death or 15 years after the last entry by the controller / processor. This period is valid if there are no legal or other pending issues or discrepancies between the data subject and the controller / processor.
Personal data relating to the health of the data subject may be stored for a longer period in a separate filing system if:
 - (a) Are only processed for scientific and statistical purposes; and
 - (b) Appropriate technical and organizational measures are in place to ensure that the principle of minimization is followed and
 - (c) Appropriate technical and organizational measures are implemented which will no longer allow the identification of the data subject.

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- For the purpose of promoting the services provided and in any other case, the processing is based on your consent. Your personal data will be retained for a period not exceeding 15 years following your last entry. Your consent however, can be withdrawn at any time. Withdrawal of consent does not affect the legal basis of consent, which was given before its withdrawal. To withdraw your consent, please contact the Data Protection Officer (DPO) Mr Spyros Rayias, at the following contact details; MKR ManSystems Business Consultants Ltd, e-mail: srayias@mansystems.org, tel. 22465990.

Your rights related to your personal Data

Any person whose data are being processed by the Center shall have the following rights:

Right to access:

You have the right to be aware of the collection and retention of your personal data and have access to your personal data

Right to data rectification:

You have the right to study, correct, update or modify your personal data after contacting the Data Protection Officer (DPO).

Right to be forgotten:

You have the right to request a deletion of your personal data we hold. This right is subject to specific restrictions depending on the case.

Right to restriction of processing:

You have the right to request a limitation on the processing of your personal data in the following cases: (a) when you dispute the accuracy of your personal data and until it is verified, (b) when you request a limitation of their use, (c) when personal data are no longer necessary for processing purposes, however are necessary for the foundation, exercise, support of legal claims, and (d) when you object to the processing and until it is verified that there are legitimate reasons that concern us and override the reasons for which you oppose to the processing.

Right to object of processing: You have the right to object at any time to the processing of your personal data, as described above, as well as for processing for direct marketing purposes, unless it is necessary for the purposes of legitimate interests we seek as processors.

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Right to data portability:

You have the right to receive your personal data free of charge in a format that allows you to access them, use them and edit them with commonly used editing methods. You also have the right to ask us, if technically feasible, to pass the data directly to another data processor.

Personal Data Security

The Center has implemented appropriate technical and organizational measures aimed at the safe processing of personal data and the prevention of accidental loss or destruction and unauthorized and / or illegal access to, use, modification or disclosure of such data. Furthermore, the Clinical Laboratory of the Center is accredited to the International Quality Standard ISO 15189 (Medical Laboratories - Requirements for Quality and Competence) as per certificate no.L086 issued by the Cyprus Accreditation Body CYSAB and operates in accordance with the Clinical Laboratory Registration and Operation Law of 1988 (132/1988). The foregoing implies that the Center takes all necessary measures to ensure the technical adequacy requirements while ensuring the confidentiality of information and personal data of customers. In any case, the way the internet works and the fact that it is free to anyone cannot guarantee that unauthorized third parties will never be able to breach the applied technical and organizational measures by gaining access and possibly using personal data for unauthorized and / or unlawful purposes.

Transfer to third countries and/or international organisations

The Center does not transfer personal data to third countries and / or international organizations.

Contact Details

For any matter or complaint regarding the processing of personal data, please contact the Data Protection Officer (DPO) directly at the following contact details: Mr Spyros Rayias, MKR ManSystems Consultants Ltd, Sotiri Tsangari 2, Dasoupoli, Nicosia. E-mail: srayias@mansystems.org, tel.22465990

Right to Complain

You have the right to file a complaint with the Personal Data Commissioner Phone: +357 22818456, Fax: +357 22304565, E-mail: commissioner@dataprotection.gov.cy