



**X-eHealth**

Exchanging Electronic Health Records  
in a common framework

## Privacy Policy

## Privacy Policy

The following section presents the X-eHealth's privacy policy. This policy will be made public through publication on the project's official website<sup>1</sup>.

### 1. Who is responsible for data processing and who can you contact?

The X-eHealth project coordination (SPMS) is responsible for all activities regarding the collection and processing of participants personal data, regardless of their degree of involvement and their relationship towards the project.

In this regard, you may contact SPMS' Data Protection Officer through the following email: Data Protection Officer | [DPO@spms.min-saude.pt](mailto:DPO@spms.min-saude.pt)

Notwithstanding, the X-eHealth secretariat contact point stands as the link for in-house smooth development regarding these affairs:

X-eHealth secretariat | SPMS [x-ehealth.secretariat@spms.min-saude.pt](mailto:x-ehealth.secretariat@spms.min-saude.pt)

### 2. Which data and sources do we use?

X-eHealth processes personal data received from participants during the project activities. This includes data that X-eHealth have received directly from participants / stakeholders, such as in the context of inquiries, workshops, surveys, or through personal contact with our project members.

x-eHealth may collect and process the following categories of personal information:

- Contact data (e.g., name, working address, contact details, e-mail);
- Documentation data (e.g., email notes, interviews);
- Correspondence.

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<sup>1</sup> To consult the X-eHealth privacy policy, check the following link: <http://www.x-ehealth.eu/work-ethics/>

### **3. For what purpose does X-eHealth process personal data?**

X-eHealth processes participants and stakeholder data in the context of the project activities.

On this basis, X-eHealth strives to ensure that data processing is in the interest of the project when using personally-identifiable information from people who have agreed to take part in these activities. This means that when a participant / stakeholder agrees, through an informed consent form, to take part in a project engagement activity (workshop, survey, etc), X-eHealth will use his/her personal data only for administrative purposes, such as event attendance, relevance of role, and sharing the activity output. Moreover, in general terms, X-eHealth uses your personal information to manage the selection and logistics of participants.

X-eHealth will always make explicitly clear the acknowledgment of an informed consent form as a preliminary requirement to engage in project activities, which participants may withdraw at any time. Should any concern arise, please use the contact details mentioned in point 1 of this privacy policy.

X-eHealth processes your personal data in accordance with the provisions of the GDPR and applicable national and international Data Protection laws. Data processed for these purposes will be used for X-eHealth-related activities only. Your data will under no circumstances be disclosed or sold to any third party except processors carefully chosen and bind by contractual obligations to process personal data on behalf of controller and in compliance of GDPR.

#### **4. Who can have access to your data?**

Your data can be accessed by X-eHealth consortium partners if this is necessary to fulfil our contractual and legal obligations.

Access to your personal data will not be given to third parties unless you have given us your prior consent, or if a legal basis exists.

In addition, X-eHealth may employ various service providers (contractors according to Article 28GDPR), which X-eHealth contractually commit to the requirements of the GDPR and whose compliance X-eHealth monitor. These include companies in the areas of IT services, printing services, telecommunications, consulting or sales and marketing. Other data processors may only use personal data in accordance with X-eHealth instructions and for a specific purpose.

Exempted from this is the transfer to service partners, such as logistics service providers or forwarding agencies, in so far as the transmission of information is required for their order. They receive the data required for delivery for their own use. We limit ourselves to the transmission of the data necessary for delivery.

#### **5. How will we obtain your consent?**

X-eHealth requires that the consent of the data subject is freely given, specific, informed and unambiguous for the processing of his or her personal data, using formal templates (Consent Form) designed on a case by case basis, considering the type, scope and extension of mentioned personal data processing.

## **6. How long will your data be stored and how do we protect it?**

Your personal data will be retained for as long as required for the purposes described in this privacy policy, for compliance with statutory obligations and for solving any disputes.

The X-eHealth project coordinator (SPMS) will take appropriate technical and organizational measures to protect your personal data against loss or unlawful use. To do so, all personal information is on a secure, private and certified platform, administered by the Project Coordinator's data protection officer and whose contact you may find in point 1.

Personal data of participants and stakeholders will be stored until the X-eHealth project is officially completed. To this end, the data will be kept until the European Commission approves the official conclusion of the project, which may include an audit. Once concluded, the data will be deleted from the platform.

## **7. What will we do if there is a Data Breach?**

In case of a data breach, the X-eHealth project coordinator will initiate a protocol to evaluate and solve any security incident, including the assessment of risks of such incident to your rights and freedoms. Any security incidents that may cause a high risk to your rights and freedoms will be reported to the Data Protection Officer, who in turn will carry out all steps necessary to minimise negative consequences. You will promptly receive a notification by email about the nature of the data breach, the information lost and the actions taken.

## 8. What data protection rights do you have?

Participation in X-eHealth activities is always voluntary. You have the right to withdraw your consent and participation at any time according to GDPR without any consequence. Participation can be withdrawn by sending an email request to the Data Protection Officer (see point 1). In such case, the collected data will not be used for the X-eHealth project and will be erased, unless you agree that your personal data can be used for the project.

You can also require information about your personal data processed by us. If your details are not (or are no longer) accurate you can request a rectification.

Furthermore, according to Article 17 of GDPR you can request the erasure of your personal data if:

- Your personal data is no longer required for the purposes for which it was collected;
- You revoke your consent and there is no other legal basis for retaining it;
- You object to the processing and there are no overriding reasons for processing that are worthy of protection;
- Your personal data has been processed unlawfully;
- Your personal data must be deleted to comply with legal requirements.

Please note that the legal obligations of the person responsible can lead to the fact that your data cannot be deleted or it will be only after expiration of a period of time.

In addition, you have a right to restrict processing in accordance with Article 18 of GDPR, the right to object under Article 21 of GDPR, the right to data portability under Article 20 of GDPR and the right not to be subject to a decision based solely on automated individual decision-making under Article 22 of GDPR. You also have the right to lodge a complaint with a supervisory authority.

## **9. How do you know if X-eHealth privacy policy has changed?**

Any changes X-eHealth may make to its privacy policy in the future will be posted on this page. For reasons of transparency and clarification, at the end of this page you can find the update number and the respective publication date. Please check back frequently to see any updates or changes to our privacy policy.

## **10. Links to other sites**

Even though X-eHealth website has links to other websites which, in our point of view, may contain useful information for our visitors, our Privacy Policy does not apply to third-party websites.