

We care for your Data Protection

Cyprus Anticancer Society Data Protection Notice

This Data Protection Notice relates to the personal data collected and processed by the Cyprus Anti-Cancer Society (referred to as 'we', 'us', 'our' or the 'Society').

The Cyprus Anti-Cancer Society is a Limited Company registered in the republic of Cyprus with registration number HE3951 having its registered office and head offices at 12 Demetriou Chamatsou, 2024 Strovolos, Nicosia, Cyprus. The Society also operates offices situated at (a) 62 Nicodemou Milona, 3095 Limassol, (b) 31 Mystra, 6042 Larnaca, (c) 8 Lykavitou, 8021 Paphos (d) 17 Soteras, 5286 Paralimni.

The Society is committed to protect your Data Protection and handle your personal data in an open and transparent manner. We are aware of the importance of the personal data you have committed to us.

This Data Protection Notice provides an overview of how and why the Society collects and processes your personal data and informs you about your rights under the EU General Data Protection Regulation ("GDPR") and any law supplementing or implementing the GDPR. It is directed to natural persons who receive treatment by the Society, visitors, volunteers, members, third parties and any other natural person of whom the personal data are processed by the Society.

For the purposes of this Data Protection Notice:

- when we refer to "personal data" or "personal information" we mean data which identify or may identify you and which may include, for example, your name, address, identification number, telephone number, date of birth, occupation, data concerning your health or family status.
- when we refer to "processing" we mean the handling of your personal data by us in any way, including collecting, protecting, transmitting and storing your personal data.

Please read the following carefully in order to understand our policies and practices regarding your personal data and how we process them.

How we collect your personal data

We obtain your personal data mainly through any information you provide directly to us or through information provided by third parties. Below is a list of ways in which we collect your personal data.

- a. Personal data collected directly from you or via your representative, including:
 - when you visit the Society;
 - when you are an employee of the Society or a candidate for employment
 - when you are authorized by the Society to participate in fundraising activities
 - when you register as a member
 - when you register to provide volunteer work
 - when you enter and use our website, and
 - when you contact us for any enquiries, complaints or for any other reason,
 - when you provide services or goods to the Society.
- b. Personal data collected from other sources, including:
 - your physicians;
 - public sources
 - regulatory and/or supervisory authorities
 - governmental organizations;
 - other non-affiliated entities with which we have a relationship for the purposes of the provision of our services.

What personal data we collect

The personal data that we may collect or obtain may vary depending on the service that we may provide to you or the activity that you may participate in or acting in your capacity as member and may include:

- a. **For patients:** Name, address, contact details (telephone, email), identification data, date of birth, place of birth (city and country), medical records.
- b. **For members, volunteers, or fundraisers:** Name, address, contact details (telephone, email), identification data, date of birth, place of birth (city and country).
- c. **For our employees:** Name, address, contact details (telephone, email), identification data, date of birth, place of birth (city and country), social security number, medical history, sick-leaves and leaves of absence.
- d. **For service providers or supplier:** contact details (telephone, email), identification data.

Our principles

We will only collect and use your information where we have lawful grounds and legitimate business reasons to do so in alignment with applicable data protection regulation.

We will be transparent in our dealings with you and will tell you about how we will collect and use your information.

If we have collected your information for a particular purpose, we will not use it for anything else unless you have been informed and, where relevant, your permission has been obtained.

We will only ask for the information that is necessary in relation to the purposes for which we are collecting it.

We will update our records when you inform us that your details have changed.

We will regularly review and assess the quality of our information.

We will implement and adhere to information retention policies relating to your information, and will ensure that your information is securely disposed of at the end of the appropriate retention period.

We will observe the rights granted to you under applicable Data Protection and data protection laws, and will ensure that queries relating to data protection issues are promptly and transparently dealt with.

We will train our staff on their data protection obligations.

We will ensure we have appropriate physical and technological security measures to protect your information regardless of where it's held.

We will ensure that when we outsource any processes, the receiver of your personal data has appropriate security measures in place and will contractually require them to comply with these Data Protection principles.

We will ensure that suitable safeguards are in place before personal information is transferred to other countries.

Personal Information we collect about Children

We understand the importance of protecting children's Data Protection. Currently we may collect personal information in relation to minors only on the condition that we have first obtained the consent of their parents or legal guardians. Under the current Data Protection Notice, "minors" are individuals under the age of fourteen (14).

On what grounds will the Society process your personal data

We will process your personal data in accordance with the GDPR and the local data protection law on one or more of the following grounds and purposes. In case, you do not wish the Society to process your data then we will not be able to perform of our tasks that relate to the below purposes:

1. For the performance of a service provided by the Society to you as a patient.

Processing is necessary for us in order to provide you with our services, and more specifically in order to:

- Provide palliative care;
- Refer you to other healthcare professionals;
- Communicate with you regarding issues and/or enquiries you may have;
- Notify you about any changes to our services.

2. For the purpose of compliance with any applicable Cyprus legal obligations.

As a Society, we are subject to various legal obligations, namely statutory requirements (e.g. « Περὶ Ἰδιωτικῶν Νοσηλευτηρίων (Ἐλεγχος Ἰδρύσεως καὶ Λειτουργίας) Νόμοι του 2001 εἰς 2017 » and « Περὶ διενέργειας ἐράνων νόμος του 2014 » 68(I)/2014) as well as requirements by supervising and/or regulatory bodies, such as the Ministry of Health, Ministry of Interior and others.

3. For Safeguarding legitimate interests pursued by us or by a third party, provided your interests and fundamental rights are not overridden by our interests.

Where necessary, we collect and process personal data in order to safeguard legitimate interests pursued by us or third parties and always provided that such interests do not override your interests and fundamental rights and are within your personal expectations with regard to our processing of your data. More specifically, we may process your personal data in order to:

- Manage human resources employed by the society and perform staff planning
- Process your donations
- Organise and perform fundraising events
- Maintain our accounts and records,
- enhance the security of our network and information systems,

- identify, prevent and investigate fraud and other unlawful activities
- safeguard the security of our people, premises and assets and prevent trespassing through video surveillance,
- modify, personalise or otherwise improve our products and services,
- defend, investigate or prosecute legal claims, and
- consult with external legal and/or tax consultants.

4. When have obtained your specific consent for processing.

We will only ask for your consent when we wish to communicate our news, actions and events in relation to the activities of the Society which we believe may be of interest to you.

You may withdraw your consent to such processing at any time. Please note that the lawfulness of any processing that was carried out prior to the withdrawal of your consent will not be affected in any way. Consent withdrawal requests should be submitted to consent.withdrawal@anticancersociety.org.cy.

5. To protect your vital interests.

We will process your data, in any way we believe it is appropriate, when we are faced with critical decisions concerning the protection of your life and only when you are incapable of providing your consent.

6. To fulfil our duties as a Private Hospital.

As a registered private hospital, we may process data concerning your health to provide or participate in the formation of a medical diagnosis and treatment. We also process your medical records data when the Society acts as part of the General Health System.

7. To evaluate the capacity of our employees.

We process the sensitive data of our employees to determine their continuous ability to work in our institution and to protect the health of others when we serve them.

8. When to assist in the general efforts to deal with extreme situations endangering public health.

We may assist in the general efforts of the Republic to deal with extreme situations threatening public health, for example, during a pandemic. In such cases, we may process your sensitive data to fulfill our obligations when acting as part of the development of appropriate medical treatment, assisting in containment efforts or facilitate the production of relevant reporting.

We do not employ automated decision-making, including profiling for the performance of the above.

Who we share your personal data with

We may share your personal data outside the SOCIETY under certain circumstances listed below. When we do so, we require those third parties to have appropriate technical and organizational measures in place to protect your personal data. We will not share any of your personal data for any purpose other than the purposes described in this Data Protection Notice, nor will we sell your personal data to anyone.

- With the third party medical practitioners or doctors or medical institutions involved in the particular patient treatment,
- with law enforcement agencies, judicial bodies, government entities, tax authorities or regulatory bodies around the world;
- with other third parties where required by law;
- where required by our auditors and accountants, financial and business advisors, legal consultants; and
- with third parties providing services to us such as file storage, archiving and/or records management services.

How we store and protect your personal data

We may keep your personal data in different formats including in:

- hard copies (for example, of forms that you fill out and submitted),
- digital copies (for example, of hard copies that are scanned into our systems),
- electronic copies (for example, when we input information about you directly on our computers).

We strive to offer you additional security and improve and extend further our security measures regarding your personal data. Such measures include:

- providing constant education and training to our staff on Data Protection awareness and especially when handling personal data;
- having in place administrative and technical controls to have access controls and system restrictions to data including physical security passes to premises; and
- implementing up to date technological measures, i.e. firewalls and encryption procedures and anti-malware processes to prevent decoding by unauthorized persons and reduce the risk of a data breach.

How long the Society will keep your personal information

By providing you with services, we create records that contain your information, such as medical records. Records can be held on a variety of media (physical or electronic) and formats.

Retention periods for records are determined based on the type of record, the nature of the activity, the activity or service provided and the applicable local legal or regulatory requirements. We normally keep medical records for up to fifteen (15) years in accordance with the directions of the Data Protection Commissioner (<http://www.dataprotection.gov.cy>) after your relationship with the Society has ended, whilst other records are retained for shorter periods, for example CCTV records are kept for six (6) months after they have been recorded.

For natural persons who may wish to stop receiving our informative material or who do not wish to provide volunteer work, personal data are retained for a period of one month from the date of the withdrawal application.

For prospective employees' personal data we shall keep personal data for six (6) months from the date of notification of the rejection of your application for treatment or from the date of withdrawal of such application, as per guidance 1/2017 and 2/2017 of the Data Protection Commissioner (<http://www.dataprotection.gov.cy>).

Retention periods may be changed from time to time based on business or legal and regulatory requirements.

We may on exception retain your information for longer periods, particularly where we need to withhold destruction or disposal based on an order from the courts or an investigation by law enforcement agencies or our regulators. This is intended to make sure that the Society will be able to produce records as evidence, if they're needed.

Transfer of your personal data to a third country or to an international organisation

Your personal data will not be transferred to third countries (countries outside of the European Economic Area). In the highly unlikely event that we do, we will ensure that you have given us your consent to do so.

Your rights under the GDPR

You have the following rights in terms of your personal data the Society holds about you:

- **Request of access** to your personal data (commonly known as a "data subject access request"). You have a right to get access to the personal information we hold about you.
- **Request to rectification "correction"** of the personal data that we hold about you. You have a right to rectification of inaccurate personal information and to update incomplete personal information.
- **Request the erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no obligation for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **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 i.e. for direct marketing purposes.
- **The right to withdraw consent.** Withdraw the consent you gave us with regard to the processing of your personal data for certain purposes, such as to allow us to promote our products and services to you.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you. You can exercise your right where one of the following applies to your personal data:
 - Your personal data are not accurate.
 - The processing performed is unlawful but you do not wish for us to delete them.
 - Your personal data are not relevant any more, but you want us to keep it for use in possible legal claims.
 - You have already asked us to stop using your personal data but you are waiting us to confirm if we have legitimate grounds to use your data.
- **Request to data portability "the transfer"** of your personal data to another party. Request to receive a copy of the personal data concerning you in a format that is structured and commonly used and transmit such data to other organisations. You also have the right to have your personal data transmitted directly by ourselves to other organisations you will name.

You should note however that some rights are not absolute and we may refuse to provide a particular right under certain circumstances. For example, when your identity is not verified, when the rights of others are affected, when the Society demonstrates compelling legitimate grounds for the processing or for the establishment, exercise or defense of legal claims.

Who you can contact with regard to your personal data and the GDPR

For any queries, additional information and or complaints regarding the collection, processing and storing of your personal data or if you wish to exercise any of your rights, please do not hesitate to contact us and we shall be happy to provide you with a response the soonest. Kindly contact us at info@anticancersociety.org.cy.

The Society takes your rights very seriously. However, if you are of the opinion that we have not dealt with your concerns adequately you also have the right to submit a complaint to the Office of the Commissioner for Data Protection. You can visit their website to find out how to submit a complaint (<http://www.dataprotection.gov.cy>). However, we would be happy to consider your concerns before you submit any complaint to the Data Protection Commissioner.

Data Protection Officer

We have appointed a Data Protection Officer (DPO) who is responsible to monitor compliance with Data Protection matters. In case you would like to exercise a right, or you would like to report a complaint or any other matter relating to the protection of your data you can contact our DPO at info@anticancersociety.org.cy

Updates to this Data Protection Notice

We may update or amend the current Data Protection Notice from time to time in order to take account of changes in our business and legal requirements.

We will notify you appropriately when we make changes to this Data Protection Notice and we will amend the revision date at the top of this page. We do however encourage you to review this statement periodically so as to be always informed about how we are processing and protecting your personal information.

Cookies

Our website uses small files known as cookies to make it work better in order to improve your experience. To find out more about how we use cookies please see our cookie policy.

More information on Data Protection

You can also access the website of the Office of the Cyprus Commissioner for Data Protection on <http://dataprotection.gov.cy>, where you can find further details on the application of the GDPR.