

ESTRO PRIVACY AND DATA SECURITY NOTICE

This Data Privacy and Security Policy is a dynamic document, which will reflect our continuing vigilance to properly handle and secure information that we are trusted to maintain.

This privacy policy informs you about the information we collect and how we may share it and your choices regarding the sharing of your personal information. This policy applies to the ESTRO.org website, Dove library, registrations and other places where we may collect personal information. **By registering under ESTRO.org, you are accepting the practices described in this Privacy Notice.**

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1. INTRODUCTION

The purpose of this policy is to outline essential roles and responsibilities within ESTRO for creating and maintaining an environment that safeguards data from threats to personal, professional and institutional interests and to establish a comprehensive data security programme in compliance with applicable law. This policy is also designed to establish processes for ensuring the security and confidentiality of confidential information and to establish administrative, technical, and physical safeguards to protect against unauthorised access or use of this information.

2. SCOPE

This privacy policy applies to your use of the websites (collectively referred to as the “Website”), operated by The European Society for Radiotherapy & Oncology, a Belgium based non-profit and scientific organisation, referred to interchangeably hereafter as “ESTRO”.

ESTRO respects your privacy and is committed to protecting the confidentiality of your personal information. This policy explains how ESTRO collects and uses information of its members and contacts and how it protects your privacy. It also explains how you can manage your own personal information held by ESTRO in the ‘My ESTRO’ area on the ESTRO website.

This policy applies to personal information held about individuals. It does not apply to information ESTRO holds about companies and other organisations. It is in addition to any specific policies concerning specific products or services. It does not supersede the ESTRO terms and conditions which govern the use of the ESTRO Website. ESTRO reserves the right to amend this privacy policy at its sole discretion, without prior notice, at any time, with the provision that details of the amendments are published on the ESTRO Website. They become effective from the time of posting. ESTRO is the sole owner of the Website and as such is the sole owner of any information collected through the Website.

Some features on the Website may require you to register as a user and to receive our authorisation before you can use those particular features. Whether you are an individual or a corporation, partnership, or other form of commercial enterprise, in order for you to obtain our authorisation to use those features and to be considered a registered user, you may be required to provide us with certain information about you or your business and, if a business, any or all individuals you designate to represent that business in connection with your use of the Website (e.g. names, addresses, e-mail addresses, telephone numbers, and other personally identifiable information of each individual who will use the Website). Once we have authorised you as a registered user, we may provide you with a customer identification number and a password.

Generally, you will be able to change your password and any personal data you have given us. Please note that submitting information to us is not a guarantee or assurance that we will grant authorisation to you or permit you, or anyone you designate, to use any or all of the services of the Website. If for any reason you are not granted authorisation we will retain the information you submit to us only in order to communicate with you regarding your application; we may, however, request additional or follow-up information as may be required by law or regulation.

If you are submitting information on behalf of others you represent for registration purposes or otherwise, you have to have their permission, agreement and full authorisation to provide this information to us. We reserve the right (a) to ask you to provide evidence of your authority at any time during, or even after, the submission process and (b) to contact those individuals to confirm your authority at any time. If we

determine that your authority has not been properly obtained, we may immediately and without notice to you discontinue your authorised use of those features of the Website for which you have registered.

3. HOW TO APPLY THE TERMS OF THIS DOCUMENT

3.1 - For users located in the European Union

Under EU legislation, any information relating to an identified or identifiable natural person is “personal data.” Personal data must be held in accordance with the legal framework set out in the Data Protection Directive 95/46/EC (the “Data Protection Directive”). All ESTRO staff handling personal data is informed of all the requirements of applicable laws and regulations. ESTRO is committed to ensuring that personal information (as sensitive data) is kept strictly confidential within the ESTRO office. Personal data may also be disclosed to certain third parties consistent with the terms of an informed consent obtained from data subjects whose personal data may be used for promotional activities. Individuals are entitled to access and correct personal data held about them or request to be removed if they so wish.

Where ESTRO collects personal data directly from individuals in the European Economic Area (“EEA”), it will inform them about the purposes for which it collects and uses personal data about them.

ESTRO recognises the importance of maintaining the privacy of information collected and/or stored online and has systems in place that protect data collected and/or stored online or via an electronic database. ESTRO has implemented administrative, physical and technical safeguards to protect electronic personal data from loss, misuse and unauthorised access. In particular, ESTRO is aware of the requirements of the international security standards BS ISO/IEC 27001:2005 for information management systems. These standards implement the Organization for Economic Cooperation and Development’s guidelines on privacy, security of information and network systems.

In order to maintain our information collection and transmission system to optimum standards, ESTRO monitors amendments to technological, regulatory and legislative standards relating to the privacy and security of personal data.

3.2 - For users located outside of the European Union

It is ESTRO’s intention to ensure that all personal data provided to it, from anywhere in the world, is held appropriately and in accordance with the international data protection rules which apply to such personal data. ESTRO intends that its standard practices and procedures with regard to the collection, use and disclosure of personal data will comply with local data protection laws, where applicable. The Organization for Economic Co-operation and Development (“OECD”) Guidelines on the Protection of Privacy and Transborder Flows of Personal Data (the “OECD Guidelines”) set out general Privacy Principles. These OECD Guidelines form the core of most data protection laws globally. In order to ensure a high standard of protection for personal information held and processed by ESTRO Office, personal data will be collected, used and disclosed by ESTRO in accordance with the standards set out in the OECD Guidelines.

With the consent of the data subject or pursuant to other appropriate approvals, all personal data is stored in a secure database. All ESTRO staff handling personal data is informed of the requirements of data protection related laws and regulations. ESTRO is committed to ensuring that personal data is kept strictly confidential. Personal data may also be disclosed to certain third parties consistent with the terms of unambiguous informed consent obtained from data subjects whose personal data may be used for

promotional activities. Individuals are entitled to access and correct personal data held about them or to be removed if they so wish.

Where ESTRO collects personal data directly from individuals throughout the world, we will inform them about the purposes for which we collect and use personal data about them, namely the conduct of promotional activities that may involve their personal data and any other relevant purposes. ESTRO will only provide information to third party agents for the purposes of providing outcome's services in a manner consistent with the principles described above.

ESTRO recognises the importance of maintaining the privacy of information collected and/or stored online and has systems in place that protect personal data collected and/or stored online or via an electronic database. ESTRO has implemented administrative, physical and technical safeguards to protect electronic personal data from loss, misuse and unauthorised access. In particular, ESTRO is aware of the requirement of the international security standards BS ISO/IEC 27001:2005 for information management systems. These standards implement the OECD's guidelines on privacy, security of information and network systems.

In order to maintain our information collection and transmission system to optimum standards, ESTRO monitors developments in respect of technological, regulatory and legislative standards relating to the privacy and security of personal data.

4. PERSONAL INFORMATION

4.1 - How ESTRO collects personal information

ESTRO is a scientific society which combines a wide range of activities in the field of Radiation Oncology, including:

- Provision of products and services
- Provision of membership services
- Collection and dissemination of scientific information

The sources of personal information received by ESTRO are:

- The individuals themselves
- Third parties acting on behalf of individuals (eg. an agent or secretary arranging registration for an ESTRO organised meeting or event; the submission of abstracts for events by third parties, etc)

ESTRO may collect personal information in the following ways:

- When you register personal details when creating a 'My ESTRO' account on ESTRO Website
- When you, or an agent on your behalf, enter personal details on a form (electronic or paper) requesting an ESTRO product or service (eg when registering for an ESTRO meeting or course)
- When you, or someone on your behalf, submits proposals or content in connection with scientific sessions at an ESTRO organised meeting or event (eg abstract submission)
- When you or an agent on your behalf, enter personal details on a form applying to become an ESTRO member or to apply for dual membership through an affiliate society
- When you subscribe to an ESTRO e-flash or other electronic communication
- When you participate in a survey, questionnaire or competition
- When you register to access DOVE content

4.2 - What personal information is collected by ESTRO

4.2.1 - Mandatory personal information

As a general rule, to enable ESTRO to correctly identify you and provide the products and services you have requested and to communicate with you, the following minimum information must be provided in order for your order, request, application, etc. to be processed:

- Title
- First name(s)
- Last name(s)
- Full postal address (work)
- Email address
- Gender
- Specialty
- Birthday

4.2.2 - Optional Personal Information

Other personal information may be requested to help identification or to enable ESTRO to understand your profile so you can be provided with better and more appropriate products and services (eg professional interests and topics of interest).

4.2.3 - Credit Card Information

Credit card information, along with other information related to specific transactions, is collected at the time of your order, request or application, and is used only for the purposes of that particular transaction. Online transactions use the Ogone system, where no information is stored. Information provided to the ESTRO office is not retained in ESTRO system for other transactions, and is destroyed after payment.

4.2.4 - Email address information

- Your email address is mandatory when you use ESTRO's electronic services on the ESTRO Website
- Electronic communication is for most purposes ESTRO's preferred method of communication because it is generally convenient, rapid, environmentally friendly and efficient
- You are required to supply your email address when you create your 'My ESTRO' account on ESTRO Website, which enables you to access a variety of services online.

Please note that each email address must be unique and that you are not allowed to share email addresses with another person.

4.2.5 - Data from surveys and questionnaires

ESTRO regularly conducts surveys or questionnaires whereby we collect data from volunteer respondents about a certain number of topics that are of interest to the Society or to the practice of radiotherapy. The respondent data remains completely anonymous, unless the respondents specifically choose to share their contact data. To ensure the complete anonymity of all respondents, all data collected are kept confidential and no individual respondent's answers will be disclosed at any time by ESTRO.

4.2.6 - How ESTRO uses personal information

Personal information is needed by ESTRO to enable it to properly manage its member and customer files. These files are used to enable ESTRO to fulfil its role in providing a wide range of services to its members, contributors and customers.

The personal information which you supply may be specifically used to:

- Enable ESTRO to provide you with the products or services you request
- Enable ESTRO to communicate with you about specific matters regarding your transaction, eg. registration for a meeting or event, abstract submission, membership...
- Enable ESTRO to send you information about ESTRO activities which it believes may interest you

Listed below are some of the security procedures that ESTRO uses to protect your privacy:

- A personal username and a password is required in order for users to access their personal data
- ESTRO uses firewalls to protect information held in our servers.
- ESTRO closely monitors the limited number of ESTRO employees who have access to your data
- ESTRO requires all ESTRO employees to abide by our Privacy Policy and be subject to disciplinary action if they violate it.

ESTRO respects the privacy of personal email addresses and complies with the current legislation on email communication (according to the Belgium Data Protection Act and the Tele Service Data Protection Act). ESTRO will not send you unsolicited email messages and will not contact you on behalf of third parties without your consent. Your email details will not be passed on to any other individual or organisation without your explicit permission.

Without your specific 'Opt Out' to receive e-campaigns from ESTRO you may receive emails concerning:

- Products and services similar to those you have already received from ESTRO
- Monthly ESTRO e-flash
- If you are an ESTRO Member, you will receive email newsletters as part of your membership benefits.
- Transactional messages linked to the following (non-exhaustive) list of transactions: your registration for an event, submission of abstracts, application for grants or awards, membership dues, etc.

You can manage the extent to which ESTRO communicates with you by unsubscribing for email campaigns. If you indicate that you do not wish to receive ESTRO generated emails you will only receive emails directly related to the transactions you have with ESTRO (eg confirmation of registration, membership renewal, etc.) and other necessary individual communications.

4.2.7 - How long personal information is kept

- Personal information supplied during a transaction with ESTRO: as a general rule, personal information is kept for a minimum of 5 years after the last transaction with ESTRO.
- This limit does not apply to ESTRO members, whose personal information is kept indefinitely

5. DISCLOSURE OF INFORMATION AND MARKETING

ESTRO complies with Belgium and EC directives (Belgium and the Belgian data protection legislation are both recognised to be compliant with EC Directive 95/46/EC) and takes all reasonable care to prevent any unauthorised access to your personal data. ESTRO Office and contractors have a responsibility to keep your information confidential.

ESTRO may supply your information to its contractors to perform specific services (such as to the publishers to deliver ESTRO journals, etc...). Otherwise, ESTRO does not disclose personal information to any other person or organisation without your consent.

If you are a delegate at an ESTRO organised event or course, and you visit exhibiting company stands, presenting your badge may enable them to retrieve the following personal data: first name(s), last name(s), address, telephone, fax, email, and professional activity (specialty).

6. MANAGING YOUR CONTACT INFORMATION WITH ESTRO - 'My ESTRO'

6.1 - Access to personalised services

You do not need to register to access most of the ESTRO Website, but you do have to register to use personal services online and access certain web content.

The details you provide ESTRO may be combined with information from other ESTRO records to:

- provide you with online services like abstract submission, registration for congresses, etc.
- save you time by integrating information you already provided for different ESTRO services
- allow you to access specific web content reserved for 'My ESTRO' users
- help you to benefit more from ESTRO by keeping you up to date about ESTRO activities, scientific developments, and products and services by email

6.2 - Accessing your personal information

You may at any time manage your personal information held by ESTRO by contacting the ESTRO office. If you are an ESTRO Member, or have used ESTRO products and services since 2005, a record will already exist for you which you can potentially access by logging in online through:

- using your existing login details (E-XXXX and password)
- using the 'Lost password' feature which, if your email address is recognised, will automatically send details of your username and a newly generated password (for your protection) to the email address given

Please note that ESTRO does not permit more than one 'My ESTRO' account per person to ensure accuracy in communication. So, if an account already exists for you in the ESTRO system, your new account will be matched to it, within a reasonable timeframe; this procedure may take longer during or after ESTRO organised conference/meeting periods for technical reasons.

If you do happen to create a second account, you should be aware that ESTRO will merge your membership and other information regarding products and services used between your accounts, and your contact details held by ESTRO will be replaced.

6.3 - Managing your personal information

You have the absolute right to access and oppose the use of your personal data. By accessing the 'My ESTRO' area, you have direct control over the information in your personal profile. For any change of your personal data please contact the ESTRO Office.

Additionally, you may choose whether or not you wish to be kept informed by email of ESTRO activities, products and services. ESTRO also asks you to provide optional information about your professional activities and interests in order to understand your needs better, and improve the services it offers to you and to the Radiation oncology community in general.

Your rights to Opt-out, Opt-in, or limit specific uses and disclosures of your personal data

When you register (for any ESTRO event or accessing Dove content), you may be asked whether you want to receive special announcements and future communication by email. If you check "yes" but change your mind at any time in the future and no longer wish to receive our communication and other special announcements by email you will be able to Opt-Out of these services by: (a) unsubscribing from the mailing list (b) [contacting us](mailto:info@estro.org) (info@estro.org), and we will take you off the applicable list.

6.4 - Right of access to your ESTRO information

If you would like to know exactly what personal information ESTRO holds about you, you are entitled to obtain it. If it transpires that the information is inaccurate, or you wish to oppose its use in future, ESTRO will make the necessary amendments and confirm that these have been made. Please contact ESTRO in either of the following ways:

- By [contacting us](mailto:info@estro.org) by email (info@estro.org).
- By writing to:
ESTRO
Rue Martin V, 40
1200 Brussels
Belgium
Tel: +32 (0)2 775 93 40
Fax: +32 (0)2 779 54 94

7. DATA SECURITY

To protect your information, ESTRO uses an industry standard security protocol called Secure Sockets Layer (SSL) to encrypt the transmission of sensitive information between you and our Website.

SSL is used, for example, when you login or when you make a credit card payment. To know if transmissions are encrypted, look for the lock on your web browser or check that the URL starts with https://.

Despite ESTRO's efforts to protect your personal data, there remains some risk that an unauthorised third party may find a way around our security systems or that transmissions of information over the Internet will be intercepted. ESTRO is not responsible or liable for any loss or damage of any sort arising from or relating to any breach of our security or interception of your transmissions (see Terms of Use).

7.1 Use of cookies

Cookies are pieces of information that a Website transfers to your computer's hard disk for record keeping purposes. They are small text files that a website can use to recognise repeat users and facilitate their ongoing access to, and use of, the site. They do not pose a threat to your system or files.

The use of cookies is an industry standard, and many Websites use them to provide useful features. Cookies in and of themselves do not personally identify users. Most browsers are set initially to accept cookies. You can set your computer to reject cookies. However, if you do choose to disable cookies, you will not be able to enjoy the full range of online services available through the 'My ESTRO' area.

7.2 Use of web analytics

As a Website gathers individual pieces of non-personal information from its users, it may combine similar data from many or all the users of the Website into one big "batch". This sort of statistical information is called aggregate data because it reflects the habits and characteristics of a large group of anonymous people. Websites may use aggregate data or share it with business partners so that the information and services they provide best meet the needs of the users. Aggregate data also helps advertisers and sponsors on the Web know how effectively they are reaching and meeting the needs of their target audience.

8. CONCLUSION

If you have any further questions about the ESTRO Privacy and Data Security Policy or its implementation, or if at any time you believe that ESTRO has not adhered to the principles stated in this Policy, please [contact us](mailto:info@estro.org) by email (info@estro.org).

ESTRO is a Belgium-registered not-for-profit organisation. All funding for this site is provided directly by ESTRO. Rue Martin V 40, 1200 Brussels, Belgium

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