**VRN Privacy Statement**

This privacy statement explains how your personal data are handled by VRN.

**What are personal data?**

Personal data is information about you personally. The best-known categories of personal data are name, address, email address, age and date of birth. But it may also include your phone number, IP address and your national identification number. There are several special categories of personal data, such as data concerning your health. VRN does not process any special categories of personal data. VRN processes your personal data only if such is permitted by law and under the conditions stipulated therein.

**Who is the data subject?**

Data subjects are research staff members of the hospitals of the VRN network and persons that subscribe and/or attend our training programmes, personnel of our business collaborators, but also persons that visit our website and/or subscribe to VRN newsletters.

**What information do we collect about you?**

We may collect the following types of personal data from you:

* name, e-mail address, and telephone numbers.
* CV and professional track record.
* Information that you fill out on subscription forms for attending trainings
* Technical information when you visit our website, such as the IP address or the type of browser you are using, the type of operating system you are using, the domain name of your internet service provider, the date and time of your visit and the amount of time you spend on each page.
* Information needed when a personal login is required to enable you to access user accounts and to enable us to track appropriate use of the personalized webpages entered through the login system.

**What do we use the personal information for?**

*For administrative purposes*: We may use your personal data for our mandatory administrative obligations, such as archiving obligations.

*In relation to studies*: VRN provides services to sponsors of clinical research and to CRO’s. If you agree to participate in the performance of a clinical research project, VRN uses your personal data as required under GCP and other law, regulations and guidelines applying to the performance of clinical research.

*For invoicing:*if you purchase a service of VRN such as a training, VRN may use your personal information for invoicing.

*For marketing purposes:* Individuals who provide us with personal data may receive periodic emails, newsletters, mailings, or phone calls from VRN to inform you on new trainings or studies of your interest. You may opt out on such mailings at any time by contacting us at [info@vrn.nl](mailto:info@vrn.nl).

*Other***:** VRN may process personal data from you to the extent this may be required from time to time as allowed by article 6 of the GDPR. If required, we will always ask you for your permission.

**With whom may we share your data?**

We may share your personal data with our third-party service providers, sponsors of clinical trials, CRO’s or to regulatory authorities, based on meeting legal obligations, to effectuate a contract to which you are party, or for other purposes with your permission.

*Service Providers*: We may share any your data with our service providers, such as ICT service providers. All these service providers are bound to confidentiality and non-use obligations in accordance with the General Data Protection Regulation (EU Regulation 2016/679 - GDPR). VRN has processing agreements in place with all its third-party service providers.

*Business Partners*: VRN may share personal data with our business partners, their affiliates and vendors to the extent necessary to your performance in a clinical trial and to enable them to fulfill their legal obligations in relation to such trial and potential drug registration procedures. This includes that your information is published in clinical trial registries, such as clinicaltrial.gov.

*Regulatory authorities***:** VRN may share your information with authorities that have a right to access your personal data based on law provisions.

**Personal data protection**

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we appropriate physical, electronic, and managerial procedures to safeguard and secure the personal data in our custody. Unfortunately, protective measures cannot always be guaranteed to be 100% secure, but we keep our protection measures updated to the state of the art, as much as possible.

**Cookies and log files**

We receive IP addresses in the normal course of the operation of our website. An IP address is a number assigned to you by your Internet service provider so you can access the Internet.

We may use cookies, pixel tags, local storage, and other technologies (“Technologies”) to automatically collect information through the website. We use Technologies that are essentially small data files placed on your computer, tablet, mobile phone, or other devices (referred to collectively as a "Device") that allow us to record certain pieces of information whenever you visit or interact with our websites and to recognize you across devices.

*Cookies*: A cookie is a piece of data or file that a website can send to your browser, which may then store it on your computer system. Most browsers allow you to block and delete cookies. However, if you do that, the Site may not work properly or you may not be able to receive personalized content.

VRN may use cookies on our website in order to:

* *Provide access to our content*: for example, to keeping you logged in.
* *Analyze and improve your browsing experience*: for example, to track your session within our website, so we can learn what content has interested you. We will also use cookies to understand general information about users, such as areas of interest. We also check for bugs and glitches in the content.

**Pixel tags/Web beacons**

A pixel tag (also known as a web beacon) is a piece of code embedded on the Site that collects information about users’ engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page.

**Social Media Features**

Our website may include social media integrations such as the Facebook “Like” button and LinkedIn (that might include widgets such as the share this button or other interactive mini-programs). These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. These social media features are either hosted by a third party or hosted directly on our website. Your interactions with these features are governed by the privacy policy of the company providing it.

**Analytics**

We may also use Google Analytics and Google Analytics Demographics and Interest Reporting to collect information regarding visitor behaviour and visitor demographics on some of our Services, and to develop website content. This analytics data is not tied to any Personal Information. For more information about Google Analytics, please visit [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). You can opt out of Google’s collection and processing of data generated by your use of the Services by going to <http://tools.google.com/dlpage/gaoptout>.

Our uses of such Technologies fall into the following general categories:

* *Operationally Necessary*. We may use cookies, web beacons, or other similar technologies that are necessary to the operation of our sites, services, applications, and tools. This includes technologies that allow you access to our sites, services, applications, and tools; that are required to identify irregular site behaviour, prevent fraudulent activity and improve security; or that allow you to make use of our functions such as shopping-carts, saved search, or similar functions.
* *Performance Related.* We may use cookies, web beacons, or other similar technologies to assess the performance of our websites, applications, services, and tools, including as part of our analytic practices to help us understand how our visitors use our websites, determine if you have interacted with our messaging, determine whether you have viewed an item or link, or to improve our website content, applications, services, or tools.
* *Functionality Related.* We may use cookies, web beacons, or other similar technologies that allow us to offer you enhanced functionality when accessing or using our sites, services, applications, or tools. This may include identifying you when you sign into our sites or keeping track of your specified preferences, interests, or past items viewed so that we may enhance the presentation of content on our sites.

If you would like to opt-out of the Technologies we employ on our website you may do so by blocking, deleting, or disabling them as your browser or device permits

**Processing outside the European Economic Area (EEA)**

For the purposes outlined above, personal data may also be shared with parties outside the EEA. In that case, we ensure that the agreements with those parties comply with the provisions of the General Data Protection Regulation.

**Retention term**

VRN keeps personal data in any event for as long as is necessary to achieve the purpose.

The General Data Protection Regulation does not stipulate specific storage periods for personal data. Other legislation may specify minimum storage periods that we must comply with. Such legislation includes the general requirement for businesses to keep records, as set out in the Dutch Civil Code or tax laws.

## Your rights

Based on privacy law, you may effectuate rights with respect to your personal data that we process.

#### Right to object

If we use your personal data based on a legitimate interest, you have the right to object.

If you no longer want to receive VRN mailings, you can unsubscribe at any time by sending an e-mail to info@vrn.nl.

#### Right to access, rectification, to be forgotten, and the right to restriction

You have the right to demand an overview of all personal data relating of you processed by VRN.

If your personal data is incorrect, you may ask VRN to correct.

You may ask VRN to erase your personal data at any time. We are not always able to do this, however, and do not always have to comply with your request, for example if we are required by law to keep your personal data for a longer period.

You may also ask VRN to restrict the processing of your personal data on a temporary basis. This is possible in the following situations:

* you think that your personal data are incorrect;
* wrongful use of your personal data by VRN;
* we no longer require your personal data, but you still need your personal data in order to bring, exercise or substantiate a claim; or
* if you submit an objection.

**Complaint and questions**

Please send an e-mail to [info@vrn.nl](mailto:info@vrn.nl) if you have any questions about this privacy statement or if you are unsatisfied with how we handle your personal data. We will be happy to assist you.

You also have the right to file a complaint with the Data Protection Authority in your country of residence.

**Changes to the privacy statement**

Changes to the law or the VRN’s objectives may affect the way in which we use your personal data. If this happens, we will make changes to the privacy statement and notify you of these changes. We will publish any changes on the VRN website.