

PRIVACY STATEMENT

INTRODUCTION

For the purposes related to the functioning of the FOEDUS platform for international organs exchange, FOEDUS z.s. with registered office in Prague, Ruska Street 85, processes the data you provide, or in any case acquired during the execution of the FOEDUS portal functioning.

Non-acceptance of the Privacy policy does not allow you to proceed with registration, as the data requested is essential for the proper function of the FOEDUS platform.

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data.

METHODS OF DATA PROCESSING

The personal data stored are used for the sole purpose of guaranteeing the traceability of the information related to organ exchange.

The processing of data is carried out on electronic media, with procedures suitable for protecting the confidentiality of the User and consists of the collection, recording, organisation, storage, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, dissemination, cancellation, destruction of the same including the combination of two or more of the above activities.

Authentication and user management services are provided through Amazon Web Services (AWS) Cognito, which processes login credentials, authentication tokens, and user account information on our behalf. AWS Cognito operates as our data processor under a Data Processing Agreement that ensures GDPR compliance.

DATA STORAGE AND RETENTION

FOEDUS securely stores your data using Amazon Web Services (AWS) cloud infrastructure on servers located in Europe. User authentication data is processed and stored through AWS Cognito, which maintains the same European data residency requirements.

Authentication tokens and session data are automatically deleted when they expire (typically 24 hours for access tokens, 30 days for refresh tokens, unless renewed through active use). User account credentials are retained until account deletion is requested (see paragraph "User rights"), unless there are legal regulations that do not allow this procedure.

Alternatively, FOEDUS will keep user's identification and organ detail data for 10 years. Once this time period has expired, FOEDUS will anonymize user's identification data.

USER RIGHTS

The User has the following rights:

- to request from the Data Controller access to and rectification or deletion of personal data or a restriction of the processing of such data,
- to obtain information on the logic and purpose of the processing,
- to submit a complaint to the supervisory authority,
- to request data portability.

WHICH PERSONAL DATA AND COOKIES DO WE COLLECT AND FURTHER PROCESS?

In order to carry out this processing operation FOEDUS z.s. collects the following categories of personal data:

- Personal Identifiers:
 - first and last name(s),
 - corporate email address,
 - phone number,
- Account Information:
 - username,
 - password,
 - account details,
 - authentication tokens and session identifiers (managed by AWS Cognito)
 - login timestamps and authentication logs
 - device fingerprints for security purposes (if MFA is enabled)
- Organ details:
 - donor type
 - organ type
 - age
 - height
 - weight
 - blood type
 - sex
 - follow up information

When you access and navigate the FOEDUS platform, certain non-personal information about your computer may be collected. Specifically, we are using the following type of cookies:

- Authentication cookies
- User-centric security cookies
- Technical or function cookies

This type of information includes, but is not limited to:

- Device Information:
 - IP address,
 - browser type (e.g. Safari, Internet Explorer, Mozilla Firefox, Google Chrome, Opera, Dolphin, Konqueror),
 - operating system,
 - usage data.
- Registered Device Information:
 - Device model,
 - operating system,
 - usage data.
- Other Information: Any information you provide to FOEDUS z.s. voluntarily, such as through forms or surveys.

This information is collected through the browser of the User's computer or registered device also through so-called cookies. Cookies are small data files, often containing an anonymous identification code, which are sent by a web server to the User's browser and can then be stored on the hard disk of the User's computer.

The cookie recorded by the User's browser is then sent back to the site that sent it each time a subsequent connection is made. Cookies contain information that allows the User's browsing preferences to be memorised and therefore personalise a site according to the User's needs.

The cookies collected by the Owner through navigation on the Site are of a temporary nature (they do not remain on the User's hard disk once the session has ended) and consist exclusively of so-called session cookies, necessary to allow safe and efficient navigation of the Site.

The Data Controller may use cookies for statistical purposes regarding the use of the services available through the Site and to improve their use by users. In this case, the cookies will be used in an exclusively anonymous form. Most browsers are set to accept cookies, but you can reset your browser to refuse cookies or to notify you when you are receiving a cookie.

You may decide to refuse/disable cookies from the Site if your browser provides such an option, but in this case, some pages of the Site may not be reachable and/or may not function properly.

In order to modify your browser settings in such a way as to disable cookies, you are informed that it is usually possible to follow the following procedure:

- select “Internet Options” or “Preferences” from the “Tools” or “View” or “Edit” menu;
- select “Privacy” or “Protection” or “Download Files” and choose your preferred settings.

In any case, we recommend that you check the instructions and indications of your browser.

Finally, the User is informed that access to the Site, consultation of its contents and use of the services offered therein allows the web server to automatically record so-called “system logs”, i.e. information that the User’s browser sends while browsing the Site. This information consists of the web pages requested by the User, the documents consulted, modified or created, the internet protocol address, the type of browser, the browser language, the date and time of the request.

Such information and navigation data, such as cookies, are used solely to obtain anonymous statistical information on the use of the Site and to check its correct functioning.

Websites use or may use, even in combination with each other, the following categories of cookies, divided according to the classification proposed in the Opinion 04/2012 on the exemption from consent for the use of cookies issued by the Working Group ex art. 29 in the EU:

- “session” cookies that are stored on the User’s computer for purely technical-functional needs, for the transmission of session identification data necessary to allow the safe and efficient exploration of the site; they are deleted at the end of the User’s browsing “session” (hence the name) when the browser is closed. This type of cookie does not constitute a tool technically capable of affecting the confidentiality of the User’s navigation;
- “persistent” that remain stored on the hard drive of the computer until they expire or are deleted by the users/visitors. Thanks to persistent cookies, all visitors who access the site through the same computer are automatically “recognized” at each visit, since the computer itself is identified. Persistent cookies are technical tools that enable many features in order to facilitate the browsing experience of users (such as the registration of the shopping cart in online purchases). The User is entitled, however, to change the default configuration of his browser and disable all cookies (i.e. block them permanently), setting the highest level of protection.

These two types of cookies (session and persistent) can in turn be:

- “first-party” when they are managed directly by the owner and/or manager/operator of the website;
- “third party” when the cookies are set and managed by third parties who are not the owner and/or manager of the website visited by the User.

This happens because the site may contain elements such as, for example, images, maps, sounds, specific links to web pages of other domains that reside on servers other than the one on which the requested page is located. These cookies are set directly by operators of websites or servers other than FOEDUS sites, for these the User must therefore refer to the links to the privacy policies of these third parties or, alternatively, refer to the following sites that allow the disabling of most third party cookies: [Your Online Choices](#) and [AllAboutCookies](#).

THIRD-PARTY SERVICES

This website uses Amazon Web Services (AWS) Cognito for user authentication and account management. AWS processes your authentication data in accordance with their privacy policy available at <https://aws.amazon.com/privacy/> and under our Data Processing Agreement that ensures GDPR compliance. AWS Cognito may set necessary cookies and tokens for authentication purposes. These are essential for the security and functionality of your account access.

Third-party websites that can be accessed through this website are not covered by this statement. The categories of cookies used by other companies and their way of processing personal data are regulated in accordance with the information that they provide.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Personal data will be kept for as long as strictly necessary in order to achieve the purposes for which they are processed, without prejudice to the storage times required by law.

Data related to registered individuals is kept until the user personally deletes his/her/their account or requests the deletion to info@foedus-eoeo.eu.

Log files are kept for 1 year.

HOW DO WE TREAT YOUR PERSONAL DATA?

Personal data is processed by automated tools for as long as strictly necessary in order to achieve the purposes for which they were collected. Specific security measures are observed to prevent loss of data, illicit or incorrect use and unauthorized access.

WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

In the cases provided, interested parties have the right to obtain from FOEDUS, access to personal data and its correction or cancellation or the limitation of the processing that concerns them or to oppose the processing (articles 15 and following of the Regulation). Users have right to request deletion of their authentication data by deleting their account through the platform or contacting info@foedus-eoeo.eu and to receive information about authentication and login data processing. You can exercise your rights by sending a request via e-mail to the address: info@foedus-eoeo.eu, it is not subject to any formal restriction and it is free of charge.

CONTACT INFORMATION

Data controller

The Data Controller is FOEDUS z.s with registered office in Ruska Street 85 – 100 00 Prague 10 in the person of its President. If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the email address info@foedus-eoeo.eu.

The Data Protection Officer (DPO) of FOEDUS z.s.

You may contact the Data Protection Officer Martin Kostal, DERS s.r.o., Polakova 737/1, 500 02 Hradec Kralove, Czech Republic (kostal@ders.cz) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

How to contact the appropriate authority

Interested parties who believe that the processing of their personal data carried out through this website is in violation of the provisions of the Regulations, have the right to lodge a complaint with the Personal Data Protection Authority, based in Czech Republic, Plk. Sochora 27, 170 00 Praha 7, to the addresses specifically published on the institutional website of the Authority (posta@uouu.cz) as envisaged by art. 77 of the Regulation, or to take legal action (art. 79 of the Regulation).