

# **Global Neuro Data Protection Policy**

## 1. Scope

Global Neuro (hereinafter "GN") is a not-for-profit organization established under the laws of Switzerland with registered domicile at Clavadelerstrasse 1, 7270 Davos, Switzerland. Global Neuro is subject to Swiss Law and adheres to all applicable regional and local privacy laws and regulations to be considered in its activities.

At GN we highly value your privacy by default and adhere to the applicable privacy laws when collecting and processing your data. Additionally, this Data Privacy Policy is subject to continuous adaption according to changing regulation environments and is subject to auditing procedures with regards to accountability. This Data Privacy Policy outlines the principles of data collection and processing for GN and completes the GN General Terms and Conditions (GTC).

This Data Privacy Policy (hereinafter the "Privacy Policy") applies and describes how your personal data provided to GN, namely concerning the collection, storage, and usage thereof. Furthermore, it defines how collected personal data may be examined, corrected, or deleted.

Upon (i) setting a check mark by ticking the check box next to the suggested consent statement indicated on the GN website and (ii) clicking the acceptance icon indicated on the GN Website you agree to be bound by this Privacy Policy and expressly consent to our collection, storage, use and disclosure of your personal data as outlined below. You are entitled to revoke your consent at any time in writing or by email.

## 2. Legal basis of data processing

As legal basis for processing your personal data we always ask for your actively given consent, contractual consent, or by disclaimer to capture and specifically use your data before collecting or storing it. Further purposes can be legal obligations or obligations set by competent authorities, protection of vital or public interests, or justified interests of the person responsible or a third party.

## 3. Data Protection Officer (DPO) at GN

The DPO of GN is a person as named from time to time and is responsible to keep protected data handling and to resolve your inquiries.

For questions, requests or further information related to data processing by GN, you may write us an e-mail at info@globalneuro.org. Your questions or requests will be handled by the DPO of GN responsible to keep protected data handling and to resolve your inquiries.



## 4. Collection of personal data

The following processing principles apply at Global Neuro:

- lawfulness, fairness and transparency
- purpose limitation
- data minimization
- accuracy
- storage limitation
- integrity and confidentiality
- accountability

Based on information provided by you, the following personal data will be stored:

#### Identity data

User name, registration date, password, user ID, first name, last name, academic title before name, academic title after name, profession, job title, gender, date of birth, nationalities, primary language, secondary languages, areas of specialty.

#### Contact details

Primary email address, secondary email, mobile phone, home phone, work phone, work organization, department, work address, work city, work state/province, work postal code, work country, assistant name, assistant email, assistant phone, home address, home city, home state/province, home postal code, home country.

#### Professional details

Profile image, affiliations, biographical information, year of graduation from medical school, nursing school, other health care institutions, residency training, fellowship training, with school, degree, specialty or subspecialty.

#### **Educational history**

AO Neuro / GN Educational Event history (event name, type, year, activity levels) and evaluation scores related to GN Educational Events.

#### Faculty data

Status faculty active, functions (KOL, founding member, board member), faculty image, CV upload, education information (medical school, internship, residency training, fellowship training), expertise data (publications, presentations), events taken part in (dates, lieu, role, evaluation scores, faculty development activities and history).

### <u>Travel data</u>

Preferred travel agent, favorite airline(s), favorite airline alliance(s), departure location (airport, city), dietary request, seating preference, hotel room type, smoking preference,



car type, passport number, passport issued in (city, country), passport issued on, passport valid until, first name in passport, family name (surname) in passport, frequent flyer information, favorite hotel chains, favorite rental companies, additional comments/requirements, accessibility, dietary preference.

#### Event data

Badge title, organization, first name, last name, degree pre- and post-event evaluation results, learning activities and subsequent results.

#### Financial data

Reimbursement information: reason for reimbursement (description), city, country, your role, claim, date, per diem and expense fields, meals, mileage, parking, transport, accommodation (based on respective recent IP system), receipts, bank details (account, bank name, bank address, account holder name, account holder address, account number/IBAN code, SWIFT/BIC, other information). GN stores and uses data deriving from financial transactions on the GN Website and shall not be liable for all and any damage caused by disclosing these data to any public authorities upon official request.

Our legal basis for processing the data listed above is your consent and our legitimate interest of pursuing the purposes listed above for data collection, unless we have another legal basis, provided that we require one. Consent given can be withdrawn at any time, but this does not affect data processed prior to withdrawal.

## 5. Use of personal data

With your active consent, a contract, or by disclaimer you agree that we use your Personal Data in the way described below.

We use store and process personal information for the following general purposes:

- to enable you to access and use GN Services;
- to enable you to communicate with other users, including but not limited to sending them messages, notifications or other information;
- to enable course chairpersons to communicate with you;
- to operate, protect, improve and optimize GN Services and our business for example by performing analytics, conducting research, personalizing or otherwise customizing user experience, and to provide customer service and support;
- to help maintain a trusted environment on GN platforms, such as detection and prevention of actual and potential fraud and other harmful activity, conducting investigations and risk assessments, verifying any identifications provided by you, and



conducting checks against databases and information sources for fraud detection and prevention, risk assessment and harm prevention purposes;

- to send you service, support, and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- to send you marketing, advertising, and promotional messages and other information that may be of interest to you, including information about Global Neuro Foundation, our services, or general promotions for partner campaigns and services. You can unsubscribe or opt-out from receiving these communications in your settings;
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and to enforce our agreements with third parties.

We do not rent, sell, or otherwise share your personal data with third parties, except with your consent.

Further, we may use third-party service providers to help us deliver our service and run or analyze GN services (e.g. third-party data analytics services to analyze, among other things, server load). The use by third parties of the data disclosed is strictly limited to the aforementioned purposes.

We also reserve the right to disclose your Personal Data to (a) comply with relevant laws, regulatory requirements and to respond to lawful requests, court orders, and legal process; (b) to protect and defend the rights or property of us or third parties, including enforcing agreements, policies, and terms of use; (c) in an emergency, including to protect the safety of our employees or any person, or (d) in connection with investigating and preventing fraud.

We also aggregate data into anonymized system usage statistics.

## 6. Data transfer and transfer of data abroad

We consider the personal data referred to in this privacy notice to be confidential and will treat it accordingly.

We will only pass on your personal data to third parties if:

- you have given your consent,
- the disclosure is necessary to assert, exercise, or defend legal claims and there is no reason to assume that you have an overriding interest worthy of protection in the non-disclosure of your data,
- in the event that a legal obligation exists for the transfer; or
- this is legally permissible and necessary for the execution of contractual relationships with you.



However, we may disclose your personal data to the following categories of recipients for the purposes set out above:

- our service providers (external partner, such as banks, insurances), including processors (such as IT providers);
- dealers, suppliers, subcontractors, and other business partners;
- clients;
- domestic and foreign authorities or courts;
- the media;
- the public, including users of our websites and social media;
- industry organizations, associations, organizations, and other bodies;
- acquirers or parties interested in the acquisition of business divisions, companies, or other parts of GN;
- other parties in possible or pending legal proceedings;
- affiliates of GN.

We reserve the right to transfer, store, use, and process your data, including any Personal Data, to countries outside of Switzerland including the European Economic Area, the United States, and possibly other countries. By using GN services, you consent to us transferring your data to these countries. You should note that laws vary from jurisdiction to jurisdiction, and so laws and regulations relating to privacy and data disclosure, applicable to the places where your information is transferred to or stored, used, or processed in, may be different from the laws and regulations applicable to your place of residence. We take the legally required safeguards and contractual measures to ensure that any parties we transfer personal data to do so in keeping with the level of data protection and security prescribed by the applicable data protection regulation. If the level of data protection in a country does not correspond to the Swiss or EU standard, we contractually ensure that the protection of your personal data corresponds to that in Switzerland or the EU at all times. To this end, we agree on the EU standard contractual clauses with our partners and implement additional technical and organizational measures if necessary.

### 7. Data retention

We may retain information regarding you and your use of GN services, including personally identifying information and profiling data, for as long as needed to provide you with our services and the uses described in this Privacy Policy. Generally, this means that we will keep information for the duration of your account.

While Global Neuro Foundation strives to provide the possibility of a full deletion of Personal Data, note that any information that we have copied may remain in back-up storage for some period of time after your account deletion.



Irrespective of your account deletion, we may retain and use such data as necessary to protect our legitimate interests, the interests of third parties or the public, and to comply with our legal obligations, maintain accurate accounting, financial and other operational records, resolve disputes, and enforce our rights connected to your use of GN services.

### 8. Visiting our websites

In order to display and optimize our website content while ensuring data security, we may collect personal data from you. The same applies to the analysis of website usage and compliance with regulatory and legal requirements. If you use the corresponding functions, we also process personal data to:

- contact you
- regularly inform you about our offers (e.g., newsletter)
- interact with you in connection with our offers and website content (e.g., social media)
- otherwise specified use

### Server-Logfiles

When you access one of our websites, the browser used on your end device (e.g., notebook, smartphone, tablet) automatically sends data to the server of the respective website. This data is temporarily stored in a log file, the so-called server log files. The access data includes in particular your IP address, the type of web browser, the operating system used, the date and duration of your visit to our website and the like. This is exclusively information that does not allow any conclusions to be drawn about your person.

The processing of this data is based on our legitimate interests for the purpose of enabling the use of our websites (connection establishment), to ensure system security and stability on a permanent basis, to optimize our offers, and for internal statistical purposes. We do not disclose this data to third parties or evaluate it in any other way. A personal user profile is not created.

### Cookies/tracking and other techniques regarding the use of GN websites

We typically use cookies and similar techniques on our websites, which allow for an identification of your browser or device. A cookie is a small text file that is sent to your computer and automatically saved by the web browser on your computer or mobile device, when you visit our website. If you revisit our website, we may recognize you, even if we do not know your identity. Besides cookies that are only used during a session and deleted after your visit of the website (session cookies), we may use cookies in order to save user configurations and other information for a certain time period (permanent cookies). GN only uses technically mandatory cookies. You can revoke any consent given at any time by changing your cookie settings. Notwithstanding the foregoing, you may configure your



browser settings in a way that it rejects cookies, only saves them for one session, or deletes them prematurely. Most browsers are preset to accept cookies. We use permanent cookies in order to understand how you use our services and content. If you block cookies, it is possible that certain functions are no longer available to you. By accepting the cookies and using our websites, you consent to the use of such techniques. If you object, you must configure your browser or e-mail program accordingly.

### **Google Services**

On our websites, we use various services of Google LLC, based in the USA, respectively if you have your habitual residence in the European Economic Area (EEA) or Switzerland, Google Ireland Limited, based in Ireland ("Google"). The processing of personal data when using "Google Maps" always takes place in the USA. We may use the following Google services on our websites:

- Google Tag Manager
- Google Analytics
- Google Ads
- Google Optimize
- Google Marketing Platform
- Google reCAPTCHA

Google uses technologies such as cookies, web storage in the browser, and tracking pixels, which enable an analysis of your use of our websites. The information thus generated about your use of our website may be transmitted to a Google server in the USA and stored there. We use tools provided by Google that Google claims can process personal data in countries where Google or Google's subcontractors maintain facilities. Google promises an adequate level of data protection in its Data Processing Addendum for Products where Google is a Data Processor by relying on the EU standard contractual clauses. Although this does not provide a conclusive guarantee of compliance with Swiss or European data protection law, Google is also certified under the Swiss-USA. and EU-USA. Privacy Shield framework. For more information about Google's processing and privacy settings, please refer to Google's privacy policy respectively privacy settings.

#### Social media presence

On our websites, we have set up links to our social media presence on Facebook, Instagram, LinkedIn, and Twitter. If you click on the corresponding icons of the social networks, you will automatically be redirected to our profile on the respective social network. In order to be able to use the functions of the respective network there, you must partially log in to your user account for the respective network. When you open a link to one of our social



media profiles, a direct connection is established between your browser and the server of the social network in question. This provides the network with the information that you have visited our websites with your IP address and accessed the link. If you access a link to a network while logged in to your account on the network concerned, the content of our site may be linked to your profile on the network, i.e., the network may link your visit to our websites directly to your user account. If you want to prevent this, you should log out before clicking on the relevant links. In any case, an association takes place when you log in to the relevant network after clicking on the link.

### Integration of videos

To integrate videos on our websites, we use the services of the following providers:

- YouTube LLC based in the USA, a subsidiary of Google LLC
- Vimeo Inc. based in the USA

### 9. Your data protection rights

You are generally entitled to the rights of access, rectification, erasure, restriction, data portability, objection to processing and revocation of consent with regard to your personal data.

In those cases where we base processing on our legitimate interests, you have the right to object to the processing of your Personal Data.

For withdrawing consent or objecting to any data processing as described above, simply send an e-mail with your specific request to info@globalneuro.org.

Please note that exceptions apply to these rights. In particular, we may be obliged to further process and store your personal data in order to fulfill a contract with you, to protect our own legitimate interests, such as the assertion, exercise or defense of legal claims, or to comply with legal obligations. Also, legitimate interests of third parties or legitimate public interests may lead to a further processing of your personal data. In these cases, we can or must reject certain requests or comply with them only to a limited extent.

### 10. Deletion of your profile

Upon your written request, we will close your profile and remove your personal data from the GN Website as soon as reasonably possible, unless the processing is justified by our legitimate interests, necessary to fulfil a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims.



## 11. Data security

We use several tools (encryption, passwords, physical security, etc.) in order to protect your personal data against unauthorized access and disclosure.

We take commercially reasonable technical and organizational precautions to prevent the loss, misuse, or alteration of your Personal Data. Accordingly, we store all the Personal Data you provide on secure (password- and firewall-protected) servers.

You also acknowledge that no technical and organizational measures can fully eliminate security risks connected with the transmission of information over the internet. We therefore cannot guarantee the security of data sent over the internet. We use the common SSL (Secure Socket Layer) method in connection with the highest level of encryption supported by your browser. Usually this is a 256-bit encryption. If your browser does not support 256-bit encryption, we use 128-bit v3 technology instead.

Whether a single page of GN Website is transmitted in encrypted form is indicated by the closed display of the key or lock symbol in the lower status bar of your browser.

We also use suitable technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction or unauthorized access by third parties. Our security measures are continuously improved in line with technological developments. You are responsible for keeping the account information (user name/password) for accessing GN services confidential.

# 12. Amending of this Privacy Policy

GN reserves the right to modify this Privacy Policy at any time, without giving reasons. The current version published on our website shall apply. If the privacy notice is part of an agreement with you, we will notify you by e-mail or other appropriate means in case of an amendment and your consent will need to be renewed upon major changes and in general regularly from time to time. The modified Privacy Policy shall be deemed to be accepted by you, if you do not object to the applicability of the revised Privacy Policy within 20 days after receipt of said notice (in case of a registered user) or the publication on the GN Website (in case of a user that is not registered), for example.

## 13. Security Breach

In the event of a data security breach, GN will promptly notify the Federal Data Protection and Information Commissioner (FDPIC).