

INFORMATION ABOUT THE PROCESSING OF PERSONAL INFORMATION

Dear professionals!

VsI Nacionalinis mokymu centras (hereinafter referred to as the **Organisation**), being long-term and socially responsible participant in the Lithuanian health and education system, and in an attempt to ensure the high quality of services it provides to You (professional development events, including conferences, seminars, internal and external training, distant learning) and having assessed the need for You to be aware of the personal information processing operations performed by the Organisation, has prepared, approved and hereby publishes this information document about the processing of Your personal information.

The Organisation appreciates and values its relationship with You and therefore wishes to provide You with the information about the processing of Your personal information that is as complete, coherent and clear as possible. For Your convenience this information is provided in the form of questions and answers.

1. WHY DOES THE ORGANISATION PROCESS YOUR PERSONAL INFORMATION?

The Organisation carries out activities that involve the processing of Your personal information, such as:

- (i) organising professional development for You as a health care or pharmaceutical professional which is compulsory for You by law, choosing different forms of professional development (direct contact training, distance learning, internal and external training, etc.);
- (ii) providing You with pharmaceutical information, information about the latest legislation adopted by the MoH, approved treatment regimes, registrations of new medicinal products, medical aids and devices, scientific and methodological information that is essential to Your practice;
- (iii) handling employment and occupational safety documentation (the Organisation concludes employment contracts, keeps records of the employment contracts, performs functions of an employer as provided for by law, maintains and ensures proper communication with its employees outside business hours, ensures proper working conditions, collects and stores archival data, ensures the safety of employees and security of documents);
- (iv) preparing and handling commercial contracts (purchase and sale, lease, services, author agreements, etc.), administering contractual and related regulatory relations;
- (v) organising social events and campaigns;
- (vi) collecting, structuring and analysing information about the services You receive, determining Your needs, collecting mandatory information about Your professional development as a health care professional, generating reports about professional development as required by law;
- (vii) direct marketing operations;
- (viii) using IP address recognition (site user's web browser) possibilities (site cookies);
- (ix) collecting information about Your browsing history on the Organisation's IT system (sites) as a health care professional, log in details and activity on these sites;
- (x) collecting, storing and using images (photographs and video footage from the events organised by the Organisation) for Organisation's advertising, marketing and other related purposes; and
- (xi) using generalised data on social media browsing and interest identification.

Under the applicable legislation, the pursuit of these activities requires that the Organisation processes (collects, retains (stores), uses and transfers) Your personal information. We assure You that all of Your personal information will be processed in compliance with the EU and Lithuanian statutory requirements, Organisation's internal procedures, and terms and conditions described in this information document.

2. WHERE DOES THE ORGANISATION GET YOUR PERSONAL INFORMATION FROM?

The Organisation gets personal information from:

- (i) You directly (e.g., You provide Your personal information to the Organisation when You fill out the registration forms, log onto the Organisation's site, conclude agreements, make applications, and subscribe to newsletters);
- (ii) Your employers;
- (iii) Your social partners;
- (iv) insurance companies;
- (v) banks (e.g., information on the payments You make);
- (vi) public data bases and information systems (e.g., Register of Legal Entities, Register of Real Estate, Credit info, Regia.lt, etc.); and
- (vii) competent public authorities (e.g., State Tax Inspectorate, State Labour Inspectorate, Ministry of Health, etc.).

3. WITH WHOM THE ORGANISATION MAY SHARE YOUR PERSONAL INFORMATION?

Legislation stipulates that the Organisation may grant access to Your personal information not just to You, or use that information in its activities, but also transfer this information to other persons. The Organisation would like You to know that it has the legal and valid grounds to transfer Your personal information to:

- (i) companies and institutions associated with the Organisation (i.e. legal persons within the same group);
- (ii) insurance companies;
- (iii) public registers and information systems;
- (iv) vendors that provide services to the Organisation (e.g., financial institutions, IT service providers, lawyers and law offices, consultants and advisors, etc.); and
- (v) competent public authorities (e.g., State Tax Inspectorate, State Labour Inspectorate, State Consumer Rights Protection Authority, Ministry of Health and agencies subordinate to the Ministry, Competition Council, etc.).

4. IS THE ORGANISATION REQUIRED TO PROCESS YOUR PERSONAL INFORMATION?

Yes, it is required to do so. The Organisation processes Your personal information because:

- (i) failure to process Your personal information would mean failure to comply with the statutory requirements designed to protect your rights and legitimate interests;
- (ii) without this information it would be impossible to conclude contracts with You or implement those contracts;
- (iii) the Organisation otherwise would be unable to analyse Your needs or expectations, or ensure a higher service quality standard; and

- (iv) this would allow the Organisation to address Your requests, needs and complaints, if any, in a more expedient manner – without the collection and retention of Your personal information these operations would be impossible.

Are you required to provide Your personal information to the Organisation? No, You are under no obligation to do so. Without Your personal information, however, the Organisation will be unable to provide the services properly, or ensure that Your expectations are met.

5. WHAT PERSONAL INFORMATION ABOUT YOU DOES THE ORGANISATION PROCESS?

The extent of personal information processed depends on what categories of personal information the Organisation receives. The nature of activities of the Organisation means that the Organisation may process the following personal information about You:

- (i) contact information (name, address, residence address, telephone number, e-mail address);
- (ii) identifying information (Your position and employer's name);
- (iii) financial information (bank account number, payment details, monies transferred in exchange for goods and services); and
- (iv) other information stipulated in internal documents of the Organisation.

6. HOW LONG DOES THE ORGANISATION RETAIN YOUR PERSONAL INFORMATION FOR?

By law the Organisation is required to retain Your personal information for:

- (i) 1 (one) year if personal information relates to the job applicants at the Organisation;
- (ii) 3 (three) years if personal information relates to interns;
- (iii) 5 (five) years from the last day a service was provided to a health care or pharmaceutical professional (last day of training attended by the professional) if retained for direct marketing purposes;
- (iv) 5 (five) years if personal information relates to insurance contracts;
- (v) 10 (ten) years if personal information relates to the performance of tax liabilities; and
- (vi) 50 (fifty) years if personal information is personal information of the Organisation's employees.

7. WHAT RIGHTS IN RELATION TO PERSONAL INFORMATION DO YOU HAVE?

The Organisation recognises and respects Your rights and would like to remind You of these rights one more time:

- (i) You may request access to personal information the Organisation has about You. You may do so by submitting a written request to the Organisation.
- (ii) You may obtain a copy of Your personal information if this information does not require special processing. If Your personal information has to be processed before providing it to you, the Organisation will provide it in an aggregated format.
- (iii) You may request that the Organisation updates, corrects, deletes or destroys the personal information it has about You.
- (iv) You may ask the Organisation to limit or stop any processing of Your personal information.
- (v) You may withdraw your consent given to the Organisation to process Your personal information. Your withdrawal of consent will not affect personal information processing performed until the day of consent withdrawal.

- (vi) You may file a complaint with a competent data protection authority in relation to the processing of Your personal information.

8. ANY FURTHER QUESTIONS? CONTACT US.

Hopefully, this information has been of use to You. Should You have any further questions as to how Your personal information is processed, do not hesitate to contact a representative of the Organisation at any time at info@nmcentras.lt

Approved on June 8th, 2018