

Privacy Policy for NSGO-CTU

NSGO-CTU treats personal information and complies with the laws and principles of good data processing practices. Therefore, we have adopted this Privacy Policy, which briefly describes how we treat personal information, so legal and transparent processing is ensured.

We are responsible for processing your personal information:

NSGO-CTU is the data controller and you can contact the organization's data protection officer:

Frederikke Frimer Mikkelsen

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We treat the following personal information about personnel participating in NSGO-CTU trials:

- General personal information: For example; contact information such as name, work address, work phone number, date of birth, email address, country, work title, date of start of participation and termination in a trial and, if applicable, CV, GCP certificates, records of training and other qualification data.
- If applicable, financial disclosure forms and/or Bank account number for reimbursement purposes.

We collect personal information from:

- We will ask you to provide us the information yourself, when you in decide to take part in NSGO-CTU trials.

The organization's legal basis to process personal information:

- That we as an organization have a (legitimate) interest in processing your information, for example to secure your qualifications in handling the care of the participants in a trial.
- That it is necessary for us to fulfill an agreement with your employer
- You have agreed that we can process your information via signing the delegation log.

The purpose of processing personal information:

- The participation of an investigator or of other individuals in a clinical trial which is being conducted according to the principals governing clinical research as set out in the Declaration of Helsinki and with the acceptance of all involved Regulatory Health Authorities and involved Ethical Committees, requires collection, recording, storage, transfer and/or other use of personal data (personal data processing).
- Communicate regarding studies.
- To handle payments and reimbursements.
- To comply with legislation.

- To deliver services, in the form of the possibility to participate in the Annual Meeting, Investigator Meeting.
- To be able to give you access to IT systems, databases, eCRFs etc. related to the functioning of each individual trial.

Consent:

When you decide to take part in a NSGO-CTU trial NSGO-CTU either makes a contract with you or your employer where terms and conditions are described, or if you put your name on the Delegation Log of a trial, you agree to the information described in this Privacy Policy. However, it may happen that we judge it necessary to obtain your written consent for other purposes. In that case you will have the opportunity to voluntarily agree, and you may withdraw it at any time by notifying us.

Be aware that there are legal bases for certain forms of processing of your data for the above-mentioned purposes and that your consent is the only legal basis for other forms of processing.

Dispatch of your personal information:

Depending on your role in a trial, your personal information might be shared with personnel at other sites, monitors, group staff in other countries, NSGO-CTU office staff, members of NSGO, CRO staff, Ethics Committees and Competent Authorities, both in Europe, but also in countries outside the European Economic Area (for example the US). If your data (personal information) has been transferred, they will be subject to the data protection legislation of the respective country, also if a less severe data protection law should exist.

We do not disclose information about you to anyone outside the organization without the above consent, however, it should be noted, that if you e.g. accept an invitation to a meeting, your personal information might be forwarded to the meeting location or the meeting organizer. Only personal information relevant for the 3rd party will be disclosed in these circumstances.

Furthermore, your data can be transmitted to public databases for registration, as well as publication of a trial and your data can be stored and published in those databases.

Storing and deleting your personal information:

For historical reasons and as your details might be saved in old attendance lists, email correspondence and minutes from meetings, we cannot promise that all personal information about you will be deleted, when you end your participation in a study. In general, all information about a trial is deleted at least 20 years after end of study.

Your rights:

You have a number of rights via the General Data Protection Regulation (GDPR):

- The Right to Information (to be informed what information we process about you)
- The Right of Access (to get a print of the information we process about you)
- The Right to Rectification (to have false information about you corrected)
- The Right to Erasure (to delete information we process about you, however, information already received cannot be deleted)
- The Right to Restriction of processing (under certain conditions, to have the processing of your data restricted)
- The Right to Object (to object to your information being used for wrong purposes)

You may make use of your rights by contacting us, however, the legality of the processing carried out prior to e.g. a withdrawal will not be affected. If you submit a request to have your personal information corrected or deleted, we will investigate whether the conditions are met and, in that case, make changes or deletions as soon as possible and, if applicable, also notify our data processors to do so.

If you do not believe that NSGO-CTU handles your data correctly, you can file a complaint with the supervisory authorities – The Danish 'Datatilsynet' - About processing your personal information (www.datatilsynet.dk).

Revision of Privacy Policy:

We reserve the right to change the organization's privacy policy. When we change privacy policy, we also change the date and version number at the bottom of this document. In case of significant changes, you will receive a notification.

The current privacy policy for NSGO-CTU is available on our website.