

PRIVACY NOTICE
EUROPEAN BOARD OF PAEDIATRICS (EBP) - EUROPEAN ACADEMY OF PAEDIATRICS
(EAP) EXAMINATION

SUMMARY: 2-MINUTE-READ

We take our obligation to protect your privacy seriously!
That is why we provide you with this 2-minute summary, containing the necessary information on how we process your Personal Data.

What you should know:

First of all : you always remain in control of your data.

To whom does this Privacy Notice apply?

This notice applies to any individual whose Personal Data the European Academy of Paediatrics (hereinafter "EAP") may collect, use or otherwise process during their use of our examination Platform.

What information do we collect about you?

- Your (professional) identification details and additional application information
- Your payment information
- Information regarding the examination and your examination results and examination and deliberation notes
- Information about how you make use of our Platform

Why do we collect this information?

We collect your information in order to provide you access to our Platform to take an examination in an optimal way, in accordance with our Terms and Conditions.

Who has access to your data?

- Only the relevant part of EAP's team has access to the information you provide us with.
- Furthermore, if you take the exam as member of a university institution or other society, your personal data (in the case of university institution and other society) and exam results (only in the case of university institution) may be shared with that institution or society.
- Finally, we use some suppliers and service providers, such as but not limited to computer security, digital solutions and web hosting services. These parties are legally obliged to ensure your privacy at all times, and will only process data in accordance with our purposes.

What do you control?

- At any moment, you can request to modify, erase or get a copy of your data. To do so, we kindly request you to follow the procedure as described in our full Privacy Notice under Article 5.7.

What do we do to protect your data?

- We adopted appropriate safety measures on a technical and an organizational level.
- Your data is stored on high-security servers.
- In order to improve our Platform and ensure its safety, EAP may need to use the data you have provided us. However, at all times, EAP shall use this data in a GDPR-compliant manner, using state of the art software and solutions.
- We have implemented internal procedures to ensure the confidentiality of our IT-infrastructure and to make sure it is managed responsibly.

If you want to know more: we invite you to read our entire Privacy Notice below, which explains everything in further detail.

FULL PRIVACY NOTICE

EAP makes it a matter of utmost importance to respect the privacy of the participants of the EBP-EAP examination (hereinafter the "Exam") through its online platform (hereinafter the "Platform"). We are committed to treat your Personal Data in the strictest confidentiality, in accordance with the data protection legislation in force and the present Privacy Notice (hereinafter the "Privacy Notice").

This Privacy Notice is intended to inform you, in a transparent manner, about the data we collect, the purpose for collecting it, the way we use it and the rights you have regarding the processing of such data.

You are not obliged to provide us your Personal Data, however understand that in some cases we will not be able to carry out the requested examination or provide you the requested information in case you refuse to provide us certain Personal Data.

EAP reserves the right to change, modify and update this Privacy Notice from time to time by posting a revised version in its Platform. Therefore, we recommend you regularly consult this Privacy Notice, to make sure that you are aware of all changes.

If you have any other questions, please do not hesitate to contact us at the following address: ebpexam@eapaediatrics.eu.

Article 1 - GENERAL

- 1.1 European Board of Paediatrics – European Academy of Paediatrics (hereinafter, "we", "us", "our", "EAP"), an international non-profit association, with registered office at Avenue de la Couronne 20, 1050 Brussels, Belgium and registered with the Crossroads Bank for Enterprises under enterprise number 0412.564.952, assumes responsibility for the processing of your Personal Data as "Controller", including the use of our European Board Of Paediatrics Examination, being a platform where you can take the examination of the European Board of Pediatrics Examination (hereinafter: "Platform").
- 1.2 For students taking the exam as part of a university institution, please note that your university institution will also receive your examination results and related information. In this context, the university institution or society also acts as a Controller. EAP is not responsible for the processing of your Personal Data by these institutions.
- 1.3 In our Privacy Notice, "Personal Data" shall mean any information relating to you as an identified or identifiable natural person and user of the Platform.
- 1.4 EAP processes Personal Data in accordance with the legislation in force, and, in particular, Regulation 2016/679 of 27 April 2016 on the protection of individuals with

regard to the processing of Personal Data and the free movement of such data, applicable from 25 May 2018 (hereinafter the "GDPR").

- 1.5 The access to or use of our Platform implies your full and unreserved understanding of this Privacy Notice. This means that you were fully informed to how EAP collects, uses and processes your Personal Data, in accordance with the provisions of this Privacy Notice and for the purposes listed in this Privacy Notice.

Article 2 – WHAT PERSONAL DATA DOES EAP COLLECT

- 2.1 EAP may process, for the purposes mentioned in Article 3, the following categories of Personal Data of you as a user of our Platform:

Data	Details	Context
<p>Category 1</p> <p>(Professional) identification data and additional application information</p>	<p><u>Obligatory:</u></p> <ul style="list-style-type: none"> ● Title and name ● Nationality ● Date of birth ● E-mail address ● Password (EAP only stores the password hash) ● Centre where currently working ● Centre location (country) ● Proof of identity (valid passport or identity document) ● Medical certificate ● Description current position ● Exam location <p><u>When applicable:</u></p> <ul style="list-style-type: none"> ● Membership of university institution/society ● Primary medical qualification ● Country of issue ● Diplomas, certificates, or other proof of training in paediatrics ● A letter from your current workplace confirming your employment in a paediatric setting / the duration of employment 	<p>This information is provided by you when applying to take the Exam.</p>
<p>Category 2</p> <p>Payment information</p>	<ul style="list-style-type: none"> ● Credit card information ● VAT number (in case of a company) 	<p>This information is collected to process the payment for the Exam.*</p>

<p>Category 3</p> <p>Examination information</p>	<ul style="list-style-type: none"> • Exam date • Exam location 	<p>This information is processed when you take the Exam via our Platform.</p>
<p>Category 4</p> <p>Online examination recordings</p>	<p>In case of an online Exam:</p> <ul style="list-style-type: none"> • Screen recording and webcam audio/video of the exam 	<p>During the Exam, a screen recording and webcam audio/video will be made in order to monitor you during the Exam and in some cases verify the recordings after the Exam.*</p>
<p>Category 5</p> <p>Examination results</p>	<ul style="list-style-type: none"> • Official results letter (including subscore analysis) • Digitale certificate 	<p>Firstly, we may process your Personal Data to inform you and, when applicable, your university institution of your Exam results after you have taken the Exam on our Platform.</p> <p>Secondly, we may process your Personal Data to perform results evaluation and statistical analysis.</p>
<p>Category 6</p> <p>Examination and deliberation notes</p>	<ul style="list-style-type: none"> • Examination and deliberation notes 	<p>During the deliberation of your examination, notes can be made by us. We may process these notes for verification purposes after the Exam.</p>
<p>Category 7</p> <p>Information about your usage of the Platform</p>	<p>Information related to your use of the Platform, such as:</p> <ul style="list-style-type: none"> ▪ Features and functionalities used ▪ Page views ▪ Any personal preferences or settings ▪ ... 	<p>Information about your usage of the Platform will be processed when you make use of the Platform.</p>

*We engage external service providers Stripe (to facilitate payments) and ProctorU (to conduct screen recording and webcam audio/video monitoring). These service providers primarily act as processors on our behalf, processing Personal Data strictly in accordance with our documented instructions and under contractual safeguards that ensure compliance with applicable data protection laws. However, for certain incidental purposes, they may also act as controllers of your Personal Data. You can review the privacy notices of these external services through the following links:

- Stripe: <https://stripe.com/nl-be/privacy>
- ProctorU: <https://www.measurelearning.com/privacy-policy>

Article 3 – THE LAWFUL BASES AND PURPOSES OF DATA PROCESSING

We only process your data when we have a specific purpose and lawful basis to do so and only process what is relevant for the pursuit of each specific purpose in question, in particular:

3.1 General purposes

Data	Legal basis	Purpose
Category 1 (Professional) identification data and additional application information	Performance of a contract Terms and Conditions concluded between you and EAP Your consent (for optional data)	EAP processes your Category 1 Personal Data to facilitate your examination application and the examination itself on the Platform, in line with the Platform's Terms and Conditions. Additionally, with your consent, we may use optional Category 1 Personal Data to enhance your application and examination experience on the Platform.
Category 2 Payment information	Performance of a contract Terms and Conditions concluded between you and EAP	EAP processes your Category 2 Personal Data for payment and invoicing purposes (when your university institution or society does not cover the Platform's fees), as per the Platform's Terms and Conditions.
Category 3 Examination information	Performance of a contract Terms and Conditions concluded between you and EAP	EAP processes your Category 3 Personal Data to accommodate your examination, in line with the Platform's Terms and Conditions.
Category 4 Online examination recordings	Performance of a contract Terms and Conditions concluded between you and EAP	EAP processes your Category 4 Personal Data to monitor you during your examination and for additional post-examination monitoring, in accordance with the Platform's Terms and Conditions.
Category 5 Examination results	Performance of a contract Terms and Conditions concluded between you and EAP	EAP processes your Category 5 Personal Data to inform you of your examination results, in accordance with the Platform's Terms and Conditions. If applicable, EAP also processes your Category 5 Personal Data to inform your university institution of your examination results, based on our agreement with your university institution, and in line with the Platform's Terms and Conditions.

		Additionally, EAP may use your Category 5 Personal Data for results evaluation and statistical analysis in collaboration with independent partner institutions, in accordance with the Platform's Terms and Conditions.
Category 6 Examination and deliberation notes	Performance of a contract Terms and Conditions concluded between you and EAP	EAP processes your Category 6 Personal Data to verify your examination, in accordance with the Platform's Terms and Conditions..
Category 7 Information about your usage of the Platform	Our legitimate interest	EAP processes information about your Platform usage, in pursuit of our legitimate interests to improve our services, provide technical support, and ensure the Platform's functionality and security.

3.2 Direct Marketing

If EAP has obtained your electronic contact details while providing our services, we may use them to send you promotional material about similar services via email, based on our legitimate interest.

We will only send you promotional material about non-similar services if you have given us prior consent.

EAP may also transfer some of your Personal Data to its Data Processors for direct marketing purposes related to EAP's services.

You can opt out of receiving such emails at any time, free of charge and without providing a reason, by clicking the unsubscribe button in any promotional email or by emailing ebpexam@eapaediatrics.eu.

3.3 Transfer to third parties

EAP treats Personal Data as confidential information and will not disclose or communicate them to third parties under any condition or for any purpose other than those specified in this Privacy Notice, or under the conditions in which the law requires us to do so.

EAP may disclose your Personal Data to third parties to the extent that this is necessary to be able to carry out our business activities, including but not limited to suppliers and service providers that offer services related to IT-support, hosting, computer security or other specific services. In any case, these third parties will not disclose your Personal Data to other third parties, except in the following situations:

- the communication of your Personal Data by such third parties to their suppliers or subcontractors is necessary to be able to carry out our business activities;
- such third parties are obliged by applicable law or regulations to communicate certain information or documents to the competent authorities.

EAP will not sell or hire out your Personal Data to third parties, except in the situations described in this Privacy Notice or unless you explicitly provide your prior consent.

In the event of total or partial reorganization of EAP, transfer of EAP's activities or in the event of EAP being declared bankrupt, your Personal Data may be transferred to new entities or third parties. EAP will inform you in advance of the fact that EAP transfers your Personal Data to such third parties.

Additionally, your examination results may be shared with independent partner institutions for results evaluation and statistical analysis. The Personal Data will be aggregated using robust techniques, prior to transferring them to such institutions.

3.4 Legal requirements

In extraordinary circumstances, EAP may be obliged to transfer your Personal Data following a court order, or in order to comply with imperative laws and/or regulations. EAP will, if reasonably possible, try to inform you or your employer beforehand, unless revealing this information is subject to legal constraints.

Article 4 – THE DURATION OF PROCESSING

EAP will store your Personal Data for as long as necessary to achieve the purposes outlined in Article 3 of this Privacy Notice, including maintaining our contractual relationship.

We may also store your Personal Data to comply with legal requirements, even after the termination of our contractual relationship. The retention periods mentioned below do not apply if we are legally required to store your Personal Data for different durations, including those mandated by statutes of limitation for invoicing, payment, accounting, tax, and regulatory compliance.

Retention periods

Data	Retention period
Category 1 (Professional) identification data and additional application information	Your Personal Data contained in Category 1 will be retained for up to five (5) years after the examination (which indicates the end of our contractual relationship).

Category 2 Payment information	Your Personal Data contained in Category 2 will be retained for up to seven (7) years after the examination (which indicates the end of our contractual relationship).
Category 3 Examination information	Your Personal Data contained in Category 3 will be retained for up to five (5) years after the examination.
Category 4 Online examination recordings	Your Personal Data contained in Category 4 will be retained for up to one (1) year after the examination.
Category 5 Examination results	Your Personal Data contained in Category 5 will be retained for up to five (5) years after the examination.
Category 6 Examination and deliberation notes	Your Personal Data contained in Category 6 will be retained for five (5) years after the examination.
Category 7 Information about your usage of the Application	Your Personal Data contained in Category 7 will be retained for up to five (5) years after the examination (which indicates the end of our contractual relationship).

Article 5 – YOUR RIGHTS

5.1 Right of access and right to obtain a copy

You have the right to access your Personal Data at any time and to be informed about the purpose of its processing.

5.2 Right to rectification, erasure or restriction

You have the right to request the rectification of your Personal Data if you believe it is inaccurate.

You can also request to restrict the processing of your Personal Data if you believe it is inaccurate and have notified us of this.

Additionally, you have the right to request the erasure of your Personal Data (insofar it cannot be anonymized).

5.3 Right to object

You have the right to object to the processing of your Personal Data if you can demonstrate legitimate reasons to do so.

You also have the right to object to the use of your Personal Data for direct marketing purposes without providing a specific reason.

5.4 Right to data portability

You may request us to obtain your Personal Data processed by our Platform in a structured, commonly used format and/or transfer this data to another data controller.

5.5 Right to withdraw consent

When the processing of your Personal Data is based on your prior consent, you have the right to withdraw this consent at any time.

5.6 Automated decisions and profiling

You have the right to request not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

5.7 Exercising your rights

You can exercise your rights by contacting us with a copy of the essential parts of your ID, such as name and date of birth, as attachment:

Either through e-mail to ebpexam@eapaediatrics.eu.

Or via ordinary mail to:

EUROPEAN ACADEMY OF PAEDIATRICS/UNION OF EUROPEAN MEDICAL
SPECIALISTS-SECTION OF PAEDIATRICS
Avenue de la Couronne 20,
1050 Brussels, Belgium

5.8. Right to file a complaint:

You have the right to file a complaint with the supervising Data Protection Authority:

Data Protection Authority,

Drukpersstraat 35, 1000 Brussel,

Tel: +32 (0)2 274 48 00, Fax: +32 (0)2 274 48 35,

Email: [contact\(at\)apd-gba.be](mailto:contact(at)apd-gba.be)

This is without prejudice to proceedings before the civil courts. If you are from an EU Member State other than Belgium, you may also file a complaint with your national data protection authority (a list of the data protection authority for each EU-member state can be found

here: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

If you have suffered damage as a result of the processing of your Personal Data, you may file a claim for compensation.

Article 6 – SAFETY AND CONFIDENTIALITY

EAP has implemented appropriate technical, organizational, and physical safety measures to prevent the destruction, loss, alteration, unauthorized access, or accidental disclosure of your Personal Data, as well as unauthorized processing.

Nevertheless, if any of these events would occur and would affect your Personal Data, EAP will, where appropriate, inform you of such breach without undue delay, including a summary description of the potential impact and a recommendation on measures to mitigate the possible adverse effects of the breach.

EAP is not liable for direct or indirect damages caused by the wrongful or improper use of Personal Data by a third party.

You also share responsibility for maintaining the privacy and security of your personal data and our services, such as by not allowing third parties to access the Platform or other confidential communications.

Article 7 – APPLICABLE LAW AND JURISDICTION

This Privacy Notice is managed, interpreted, and executed in accordance with Belgian law which exclusively applies to every potential dispute.

The courts of Brussels have exclusive jurisdiction over any disputes arising from or related to the interpretation or execution of this Privacy Notice.