

## PRIVACY POLICY

### BASIC INFORMATION

#### BASIC INFORMATION ON DATA PROTECTION

**Data Controller.** The data controller responsible for the processing of the data provided is EUROPEAN BOARD OF RADIOLOGY, S.L., with address at 383, Avenida Diagonal, Sobreatico, 08008 Barcelona (Spain), NIF (VAT Number) B65668006, e-mail [administration@myebr.org](mailto:administration@myebr.org) and telephone (+34) 627 859 646 (hereinafter “EBR”).

**Purpose of processing.** We will mainly use your Personal Data for the management of your participation in examinations as well as subscription of accreditation and assessment services and to keep you informed about our products and services by sending commercial communications. ([+info.](#))

**Lawfulness of processing.** We are entitled to process your data for different reasons. The main ones are the performance of a contract with you and your consent to keep you informed about our products and services that may be of interest to you. ([+info](#))

**Recipients.** We will never sell your data. There is a possibility that companies of our group of companies or our service providers may need access to your data. ([+info](#))

**Your rights.** You have the rights of access, rectification, deletion and all other rights granted by applicable law. Please see our privacy policy for more information. ([+info](#))

**Detailed information:** You can consult additional and detailed information about Data Protection in the following link: ([+info](#)).

DETAILED INFORMATION  
**BEFORE WE START...**

- In this Privacy Policy you will find all relevant information that applies to our use of your personal data regardless of the channel or medium through which you interact with EBR.
- Some of the names we will use in this Privacy Policy are:
  - When we talk about our **Platform** or, indistinctly, our **Website**, we will refer in general terms to any of the channels or media you have used to interact with us, the main ones are:
    - Our main website: <https://www.myebr.org/>
    - Our Credential services
  - When we talk about **User**, we refer to you as soon as you have accessed one of our Websites or Platform, or because you have provided us with information through any means, such as, for example, the registration forms that are available in each case.
  - When we talk about **Regulations(s)**, we refer to applicable data protection laws.
- In addition to this Privacy Policy, the general terms and conditions you have expressly accepted for specific purposes shall also apply.
- User is informed that the completion of the data collection forms contained on the Website is voluntary, although the refusal to provide the data requested will result in the impossibility of being assisted by our services.

**1. WHO IS THE DATA CONTROLLER?**

The data controller responsible for the processing of the data provided through the Website is:

**Data controller:** EUROPEAN BOARD OF RADIOLOGY, S.L.

**NIF (VAT number):** B65668006

**Address:** 383, Avenida Diagonal, Sobreatico, 08008 Barcelona (Spain)

**Telephone:** (+34) 627 859 646

**E-mail:** [administration@myebr.org](mailto:administration@myebr.org)

**2. WHAT PERSONAL DATA DO EBR PROCESS?**

In accordance with the Regulation, "Personal Data" is any information about an identified or identifiable natural person, such as, for example, name, identification number, location data, etc.

EBR collects and process different data depending on the products, services or features you would like to enjoy at any given time or even because you contact us for any specific request. In general, the data is classified into those that you provide us directly and / or indirectly.

**2.1. Data provided directly by the User:**

- Registration data. During registration to an exam, an accreditation service or other service subscription (regardless of the channel) we may collect the following data:

name, surname, email, passport or National ID, date of birth, gender (male/female), telephone number, country, address, city, postal code and/or ESR member number.

- Optionally/additional User information. If this functionality is available, it refers to the information that you as a User can add to the Platform for the purpose of using the services and functionalities offered by EBR. It also refers to additional information that you as a User wish to share for other purposes.

## **2.2. Data provided indirectly by the User:**

- EBR collects data relating to the IP of the User's device, operating system version, the browser you use, internet connection and time zone.
- Data derived from the use of the Platform, as well as your preferences.
- Data from the device with which you as a User interact with the Platform. EBR collects data relating to the brand and Model of your device and your operating System.
- Data derived from the origin of the User and browser. In the event that as a User you reach the Platform through an external source such as, for example, a link from another website or a social network, via Google, etc., these data can be directly controlled by you as a User through the external source through which you are redirected to the EBR Platform. Consult the privacy policy of the external sources through which you navigate.
- Geolocation Data. Whenever you authorize it as a User, EBR will consult data related to the location of your device only and exclusively at the time of registration as a User. This information is simply consulted at the time of registration in order to determine the content that may be of interest to you depending on the territorial scope, as well as the language that you presumably understand so that we can communicate with you. In no case the data on tracking by geolocation or similar technology are stored in the systems of EBR. There is no tracking, real-time location, or any other type of intrusive measure in your privacy.
- Data derived from the use of Cookies. EBR may use its own and third party cookies to facilitate the navigation of Users and for statistical purposes on its website. You will be additionally informed of this and you can manage your privacy at any time.

## **3. PURPOSE AND LAWFULNESS OF PROCESSING AND STORAGE PERIOD**

### **3.1. Purpose and lawfulness of processing**

The processing of the data collected through this Website has the following purposes and lawfulness:

- I. Management, registration and participation in examinations as well as subscription of accreditation services and issuance of diplomas or the management of other services provided by EBR:** EBR uses Users' data to manage the provision of services to Users, the purchases on the exam registration platform and the Users' exam participation and the certificates and other services requesting. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- II. Processing to send commercial communications about EBR products and services:** EBR uses Users' data to send advertising messages about EBR's products and services, promotions or contests, email marketing, communications of new products or services and/or service launches and trainings (on-site/online). The User may unsubscribe from all commercial communications by unsubscribing in the function provided for this purpose in each of them. The lawfulness of processing is de User consent given.

- III. **Promotion and participation management in competitions, sweepstakes and/or training activities, both in an online and offline environment on products and services marketed by EBR:** EBR uses Users' data to manage his/her participation. Processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to conclusion of a contract.
- IV. **Processing to comply with legal, accounting, tax, administrative and contractual obligations related to the provision of the services requested by the User:** EBR uses Users' data to fulfill with its legal obligations regarding EBR commercial activity. Processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to conclusion of a contract and for compliance with a legal obligation to which the EBR is subject.
- V. **Processing to resolve claims, complaints, incidents and/or inquiries.** Processing is necessary for the purposes of the legitimate interests pursued by EBR and for compliance with a legal obligation to which the EBR is subject.
- VI. **Processing for statistical purposes and analysis:** The information may be used to analyze the behavior and preferences of the Users to offer the best possible experience in the use of the Platform and that the User can easily and intuitively access both the functionalities and the management of its privacy. Processing is necessary for the purposes of the legitimate interests pursued by EBR in order to know the interests of the Users and to be able to offer content of personalised interest to each User.

With the data collected, EBR will be able to create a "commercial profile" of the Users of the Website. No automated decisions will be made based on this profile.

We inform you that all processing of personal data carried out by EBR is carried out in accordance with Regulation.

### 3.2. Storage period

Depending on the type of processing, the data will be stored in accordance with the following:

- I. **Management, registration and participation in examinations as well as subscription of accreditation services and issuance of diplomas or the management of other services provided by EBR:** during the duration of the contractual relationship as long as there are legal obligations in relation to it.
- II. **Processing to send commercial communications about EBR products and services:** The data of the interested parties will be as long as no cancellation is requested.
- III. **Promotion and participation management in competitions, sweepstakes and/or training activities, both in an online and offline environment on products and services marketed by EBR:** during the duration of the contractual relationship as long as there are legal obligations in relation to it.
- IV. **Processing to comply with legal, accounting, tax, administrative and contractual obligations related to the provision of the services requested by the User.** We will keep your data for as long as necessary to manage the obligations of EBR.
- V. **Processing to resolve claims, complaints, incidents and/or inquiries.** We will keep your data for as long as necessary to manage the obligations of EBR.
- VI. **Processing for statistical purposes and analysis:** We will process your data on an ad hoc basis when a specific quality survey is conducted or until your browsing data is anonymized by EBR.

Once the data retention period has expired, the data, as well as any support or documents in which they were integrated, will be destroyed. All this, without prejudice to the existence of a

legal provision that requires the retention of certain data or that these may be useful in the event of a claim arising from the provision of agreed services.

#### **4. TRANSFER TO THIRD PARTIES**

EBR will not transfer User data to third parties, except in the event of a legal obligation to do so, in which case the User expressly authorizes the transfer.

Users' personal data may be communicated to EBR's data processors who assist them in processing for the purposes described in this Privacy Policy or to EBR companies, for the data of candidates who have signed up for an exam or for promotional or statistics purposes.

You can consult the companies that are part of the business group in the following link: <https://www.myesr.org/>

#### **5. EXERCISE OF RIGHTS**

We inform you that you, as a User of the Website, may exercise the rights granted to you by RGPD in relation to the processing of your personal data:

- Right of access to your personal data
- Right to rectification or cancellation,
- Right to erasure
- Right to restriction of processing,
- Right to object,
- Right to data portability,

You may at any time exercise your rights before EBR by sending us your request and identification through:

- a letter to EUROPEAN BOARD OF RADIOLOGY, S.L., Paseo de Gracia, 86, Ático, 08008 Barcelona (Spain) or by e-mail to [administration@myebr.org](mailto:administration@myebr.org). The User must enclose within the Website a copy of his/her national identity card, passport or other valid document identifying him/her.
- An email at [administration@myebr.org](mailto:administration@myebr.org).

Likewise, Users who have authorized the collection of their data and their subsequent processing have the right, in the event of their rights being infringed by EBR, to lodge a complaint with the Spanish Data Protection Agency, located at calle Jorge Juan, nº6, 28001 Madrid ([www.agpd.es](http://www.agpd.es)).

#### **6. SECURITY MEASURES AND LEVELS**

EBR has adopted the necessary measures to maintain the required level of security, according to the nature of the personal data processed and the circumstances of the processing, in order to prevent, as far as possible and always in accordance with the state of the art, their alteration, loss, processing or unauthorized access.

The data is stored on a server belonging to Arsys.

Likewise, EBR guarantees that it has implemented mechanisms in all its files (temporary or permanent), equipment and information systems containing personal data and of which it is the owner in order to comply with the current legislation on data protection, with the following functionalities:

- a) Ensure the continued confidentiality, integrity, availability and resilience of treatment systems and services.
- b) Restore availability and access to personal data quickly in the event of a physical or technical incident.
- c) Verify, evaluate and evaluate, on a regular basis, the effectiveness of the technical and organizational measures implemented to guarantee the security of the treatment.
- d) Pseudonymize and encrypt personal data, if applicable.

## **7. GENERAL**

The User who communicates data from third parties through the Website is solely responsible for having obtained the prior express consent and for having informed them of the terms contained in this privacy policy.

Please note that this Website is not intended for minors. If a minor nevertheless provides his or her personal data, he or she must have the authorization of his or her parents or legal custodian.

Our Privacy Policy may change over time, so we recommend that you read this page each time you visit our Website. If there are any changes of great relevance, we will keep you informed through this page and through individual communications sent to the address provided by you. You may, at any time, revoke the consent given.