

CING Data Privacy Policy

This Privacy Policy explains how and why the Cyprus Institute of Neurology and Genetics (“we”) collect personal data and what we do with it. This policy applies in connection with the services provided to our visitors or patients and personal data processed in respect of our employees or students or lecturers or associates. It also explains how we comply with data protection law, especially with the European General Data Protection Regulation 2016/679 (“GDPR”).

In legal terms, we are the Data Controller as we determine the means and/or purposes of the processing of the personal data held by us. We might be the Data Processor in the case that we are performing medical examinations or any other process on behalf of another legal entity that is defining the means and/or purpose of the processing. Whether we are the Data Controller or the Data Processor, the personal data stored and processed within the Cyprus Institute of Neurology and Genetics follows the current policy.

The GDPR governs how we must ensure the safety and security of the data that we process about any data subject. The first principle of the Regulation is that the data subjects’ personal data must be processed fairly and transparently. We have an obligation to let all data subjects know how we will take care of the data we hold about them and what we will use it for.

Why do we collect and use personal data?

We might need to keep records about patient healthcare and treatment and we may keep information needed to contact patients for information about their examination results or to arrange appointments.

We might hold health or genetics data on people who participate in research programs.

We might hold general contact information about people who act as next of kin for our patients and data on legal guardians to allow us contact with them in case of emergency.

We might hold the necessary data about employees and collaborators to execute the employment or other contracts.

We might hold data of candidates for recruitment.

We might hold data of visitors to the CING to monitor security of the premises.

We might collect data for volunteers for charity events and initiatives.

We might hold data of members of the public who have consented to be contacted for events and conferences.

We might hold financial related data of employees and collaborators pursuant to the applicable tax laws in Cyprus.

We might process personal data related to prospective, current and past students, lecturers, associates and others that are part of our tertiary medical academic centre to support teaching and learning and to assess the quality of education provided by the CING.

We might also process personal data about our students by sending data to other organizations including but not limited to other universities, colleges, the Ministry of Education, National Statistics Authority or any other authority.

We might process personal data to facilitate with the provision of post – graduate academic services and other associated functions.

We collect and use personal data under the following lawful bases:

- where we have the data subject's consent
- where necessary to execute a contract with the data subject
- where it is necessary for compliance with a legal obligation
- where processing is necessary to protect the vital interests of the data subject or of another person
- where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
- Where it is justified by the CING's legitimate interests or those of a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data

Where the personal data we collect is sensitive personal data, such as health, genetic profile or biometrical data, we will only process it where:

- we have explicit consent
- processing is necessary to protect the vital interests of the data subject or of another person where the data subject is physically or legally incapable of giving consent
- processing is necessary for reasons of substantial public interest, on the basis of European Union law or Cyprus law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject
- processing is executed for medical diagnosis, the provision of health or social care or treatment on the basis of European Union or Cyprus law or pursuant to contract with us and the patient for the provision of such services
- processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employees, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of European Union or Cyprus law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in Article 9 paragraph 3 of the GDPR.

The personal data that we collect, hold and share may include:

For visitors, volunteers to any of our charity initiatives, members of the public, people that are next of kin to a patient:

- Basic details such as name, address, date of birth

- ID number
- Contact information (phone number, e-mail etc.)

For patients:

- The personal data that the patients disclose when appointments are being arranged
- Sensitive data such as genetic profile, medical conditions, ethnicity, nationality
- Notes and reports about patients physical or mental health and any treatment, any care or support the patients need and receive
- Results of patients tests and diagnosis
- Relevant information from other professionals such as from the social services
- Information on medicines, side effects and allergies
- Patient experience feedback and treatment outcome information
- Financial information such as payment details

For employees or collaborators:

- Basic details such as name, address, date of birth
- Contact information (phone number, e-mail etc.)
- Curriculum vitae
- ID number, social insurance number, IBAN number and other financial information

For candidates for recruitment

- CV and the corresponding cover letters that candidates share with us

For research program participants

- The necessary personal data that we must collect and process are defined by each research program and are being indicated in the consent forms signed by research program participants

For prospective, current and past students:

- Basic details such as name, address, date of birth, phone number, email address, nationality, passport/identity number and copy of said identification document, and their marital status
- Results of exams, presentations, assessments
- Academic achievements and awards
- Data on student characteristics such as ethnic group, any special educational needs (e.g. dyslexia) any personal/familial circumstances (e.g death of a loved one) that could affect their mental state and therefore may affect their studies
- Exclusion information

- Details on any medical conditions that may affect the studies (only for active students);
- Any information that may affect the student's mental state; and

For lecturers and/or academic staff and/or associates:

- Basic details such as name, address, date of birth, phone number, email address
- Appraisals and/or reviews of the academic staff
- Academic and work experience
- Financial information such as Social Security Number and bank account details

We also process images captures by the CCTV system that we have installed in our premises. The processing is being performed in accordance with the CING's CCTV Policy. Subjects can request a copy of the CING's CCTV Policy from the CING General Administration Office.

How long are personal data retained?

Any personal data collected under the lawful basis of the consent, such as contact details for communication purposes will be deleted when the data subject withdraws his/her consent. Data subjects may withdraw their consent at any given time.

Any personal data collected under the lawful basis of the execution of a contract will be retained only for the period needed to execute that contract and any subsequent requests, claims and/or interests.

Any personal data collected because of a legal obligation will be retained for the period determined by the obligation itself.

Any personal data collected for any other reason will be retained only for the necessary period based on the purpose the data has been provided and not for any longer period.

We have set out an extensive policy as to the retention period of specific data. If you require more information you may contact our Data Protection Officer through the email dpo@cing.ac.cy or our offices at 22392821, 22392725

Who do we share personal data with?

We routinely share patient data with health professionals directly involved with the patient's care. We may share patient personal data with other health provider organizations or national authority for health care purposes.

Similarly, we may need to share information from patients' health records with third parties for the purposes of evaluating the quality of care that we provide. However, we will not disclose any health-related data to third parties for such purpose without the patient's consent unless there are exceptional circumstances, such as when the health or safety of others is at risk or where the law requires it.

We may also be asked by statutory bodies to share basic information about patients, such as data subject name and address, but not sensitive information from health records. When this happens, it is normally because we are obliged to share such information that will assist the bodies to carry out their statutory duties.

We may transfer some of the personal data that we hold to financial institutions and/or auditors and/or legal representatives to execute payments or take other actions in order to execute a contract or to be in accordance with the Law.

In any event that we would be required to share personal data with third parties we will ensure that we will comply with the provisions of the GDPR. We will provide only the minimum amount of personal data necessary to fulfil the purpose for which we are required to share the data. We also take care to ensure that the third party is compliant with the provisions of the GDPR before sharing any personal data with them.

We do not share personal data about anyone without the necessary consent unless the law allows us to do so. Data subjects have the right to refuse/withdraw consent to personal data sharing at any time. Any possible consequences from such refusal will be fully explained to the data subjects which could include delays in receiving care. The same applies in case of the personal data of our students or lecturers or associates.

We are required by law to transfer certain information about students to specified external bodies which include the Ministry of Education, the Cyprus Agency of Quality Assurance and Accreditation in Higher Education, the Migration Services, the Foundation for the Management of EU Lifelong Learning programs, so that they can meet their statutory obligations.

We may also be required to transfer personal data to third party education providers such as external lecturers or other educational institutions for the purposes of providing to our students the required educational services.

It is also possible that we may share personal data with third parties situated within the EU or even outside the EU. In any event that we should be required to share personal data with third parties within the EU or with countries outside the EU for which there is an adequacy decision by the European Commission, apart from the Public Authorities, we ensure that a Data Processing Agreement is in place. Such a Data Processing Agreement establishes the rules of such transfer and the security and privacy of the personal data being processed. We will only provide the minimum amount of personal data necessary to fulfil the purpose of which we are required to share the data.

In the event that we should share personal data with third parties within the countries outside the EU for which there is no adequacy decision as approved by the European Commission, we ensure that a signed set of Standard Contractual Clauses (SCC) is in place between us and them.

Data subject rights:

Data subjects have the following rights:

- the right to be informed about the collection and use of their personal data
- the right to access personal data and supplementary information
- the right to have inaccurate personal data rectified, or completed if it is incomplete
- the right to erasure (to be forgotten) in certain circumstances
- the right to restrict processing in certain circumstances
- the right to data portability, which allows the data subject to obtain and reuse personal data for their own purposes across different services
- the right to object to processing in certain circumstances

Data subjects can exercise any one and all of their rights by submitting a Data Subject Request form to:

1. The Cyprus Institute of Neurology and Genetics
P.O.Box 23462
1683 Nicosia
For the attention of the Data Protection Officer.

Or

2. By e-mail at: dpo@cing.ac.cy.

Or

3. By fax at: 22358238 (for the attention of the Data Protection Officer)

Data Subject Request forms are available through the CING website or through the CING's General Administration office. You may also file your request via a free form email at dpo@cing.ac.cy

For any concerns/complaints on the way that the CING is processing personal data, interested parties are urged to contact the CING General Administration office. Complaints can be also submitted directly to the office of the Commissioner for the Protection of Personal Data. Complaint forms for the office of the Commissioner are available through the web site: www.dataprotection.gov.cy.

If you need assistance with filing any Rights Request form, or for any other relevant queries, please contact us at 22392821 or 22392725.