**Privacy Notice for staff members of the registry site**

This Privacy Notice explains how the European Society for Vascular Surgery (ESVS), (or “we”) process the personal data of investigator and site staff (hereinafter referred to as “staff members”). Staff members are defined as: “the principal investigator, all doctors, whatever their professional specialty, as long as they are under the delegated responsibility of the principal investigator, the registry nurses, registry coordinators and registry managers, pharmacists and laboratory managers participating in the registry”.

At ESVS, we take great care in processing personal data in compliance with the EU General Data Protection Regulation (hereinafter “GDPR”) and those of the GDPR. We only collect and use the information necessary to achieve the purposes described below. Your data will be treated in accordance with this Privacy Notice at all times.

**Why this privacy notice?**

The ESVS would like to inform you how your personal data is collected and processed within our company. We assure you that your personal data is protected and managed in compliance with the legislation in force and, in particular, in accordance with the GDPR.

**Who is this privacy notice for?**

This privacy notice applies to site staff members whose personal data is being processed in relation to the registry EVeR.

**Who is responsible for processing the data?**

The data controller is European Society for Vascular Surgery – ESVS Charity (ESVS), whose registered headquarters are located at 18 Saxon Way, SO51 5PT Romsey, United Kingdom.

ESVS’s Data Protection Officer (DPO) can be contacted at EVeR.dpo@mydata-trust.info.

As ESVS is not based in the EU, they have appointed ESVS France S.A.S.U. as Data Protection Representative in the EU, who can be contacted at 275 boulevard Albert 1er, 33130 Bègles, France.

**What categories of data do we process about you and why do we process them?**

ESVS collects and processes the following categories of personal data:

* **Contact details**, such as your name, email, telephone number, work address;
* **Professional details**, such as your place of practice, job title, the medical field in which you are active, professional qualifications, scientific activities (such as previous clinical trial experience, and participation in past or pending research studies), publication of academic or scientific research and articles, and membership in associations and boards;
* Certain **financial information**, such as the declaration of financial interests, if applicable, and other financial information collected for payment and reporting of payments in connection with the conduct of the registry.

We collect personal data about you from a variety of sources, including directly from you and your institution (e.g. CV/resume), from publicly available sources (e.g. register of licensed medical practitioners in your country), online and other databases and websites, and from any other sources that you provide to participate in clinical research and development activities organised by ESVS.

Note that if you do not provide your personal data, you will not be able to participate in the registry.

**Under what lawful basis do we process your data?**

We process your personal data in relation to this registry to satisfy our legal obligations, e.g. to verify you are adequately trained, experienced and qualified to participate in the registry. This applies to all Staff Members.

Investigator personal data may be subject to additional processing, under other lawful bases, as defined in Appendix 1.

**Who do we share your personal data with?**

ESVS may share your personal data with others, in connection with the purposes described in this notice. In particular, we may make your personal data available to:

* ESVS group affiliates outside the UK;
* Regulatory bodies and authorities, e.g. in respect of clinical trials guidelines;
* Companies with whom we may partner in connection with proposed or actual projects, such as shared research initiatives;
* Our trusted service providers that supply goods and/or services to us, such as legal counsel, auditors and IT service suppliers;
* Other trusted parties pursuant to a court order, to protect the interests of ESVS, or where otherwise required by law or legal process;
* Actual or prospective purchasers of ESVS businesses in the event of a sale, merger or acquisition;

Sharing your personal data as described above may involve transferring it to other countries, including countries outside of the EU/EEA, such as USA, UK, Türkiye etc.whose data protection and privacy laws may not be equivalent to, or as protective as, those that exist in your country of residence. Any transfers of Personal Data to ESVS group affiliates, vendors or suppliers outside the EEA will be done in compliance with the international data transfer restrictions that apply under EU data protection laws, including, where appropriate, through the use of appropriate safeguards (e.g. EU model contracts clauses for data transfers).

You can receive a copy of the appropriate safeguards by contacting ESVS’s DPO at the contact details provided above (in the section entitled “who is responsible for processing the data?”).

**What security measures does ESVS take to protect your personal data?**

ESVS will take appropriate technical and organisational security measures to protect your personal data in compliance with applicable data protection and privacy laws, which includes protection against accidental or unlawful destruction, loss, alteration, unauthorised access to, or disclosure of your personal data.

When ESVS retains a service provider, that provider will be carefully selected and required to use appropriate measures in accordance with applicable law to protect the confidentiality and security of personal data. That provider will only be permitted to process your data on the written instruction of ESVS.

**How long do we keep your data?**

Your personal data will be stored for no longer than our obligations under applicable laws, considering the purpose(s) it was collected for.

**What are your rights and how can you exercise them?**

Per GDPR, you have the following rights in relation to your personal data:

– Right of access;

– Right to rectification;

– Right to restriction of processing; and

* Right to erasure.

Please, note that these rights are not absolute and will be subject to a case-by-case analysis by ESVS’s DPO.

To exercise your rights, contact ESVS’s DPO at the contact details provided above (in the section entitled “who is responsible for processing the data?”). If ESVS is unable to provide the requested data or fulfil your request, you will be provided with the reason(s) for such decision.

Please contact us if any of the details you have provided change (e.g. name or address).

You also have the right to lodge a complaint with the Supervisory Authority in the Member State of the European Union of your habitual residence, place of work or place of the alleged infringement if you consider that your personal data has/is not been processed in accordance with the GDPR. You can find the contact information of your local DPA [here](https://edpb.europa.eu/about-edpb/board/members_en).

***Changes to this Site Staff Member’s Privacy Notice***

*This Privacy Notice is effective from* ***20\_Oct\_2024****. We reserve the right to change this notice at any time (for example, to comply with changes in laws or regulations; our practices, procedures and organisational structures; requirements imposed or recommended by supervisory authorities; or otherwise). Changes to this notice shall be applicable on the effective date of implementation. We will communicate any changes to you, where we are required to do so.*

**Appendix 1:**

**Additional Privacy Notice for Investigators Only**

**Who is this privacy notice appendix for?**

This privacy notice supplements the “Privacy Notice for staff members of the registry site” (above) and applies to Investigators only. It does not apply to other site staff members. The sections described below are in addition to the sections described in the main document, above. Where sections in the main document are not duplicated in this appendix, please refer to the main document.

This privacy notice relates to the processing of Investigator personal data by ESVS in relation to future activities.

**What categories of data do we process about you and why do we process them?**

ESVS collects and processes the categories of personal data from different sources, as defined in the “Privacy Notice for staff members of the registry site” (above).

ESVS intends to create a database of Investigators in order to contact you regarding:

* Future clinical studies that may be of interest to you, based on your personal data (e.g. the medical field you are active in);
* Events that ESVS is hosting or attending that may be of interest to you, either as a participant or an attendee; and
* Company communications and/or marketing that may be of interest to you.

**Under what lawful basis do we process your data?**

We process your personal data under the following legal bases:

* Future clinical studies: Legitimate interests of ESVS
* Events, company communications and marketing: Your consent

Where you have given your consent to the processing of your personal data by ESVS, you may withdraw this consent at any time by contacting ESVS’s DPO at the contact details provided above (in the section entitled “who is responsible for processing the data?”).

**How long do we keep your data for this purpose?**

We will retain your personal data for as long as we continue to have a legitimate interest in contacting you regarding future studies that align with your interests/expertise.

Where you have given consent to the processing of your personal data, we will retain your data until you withdraw your consent, or your interests/expertise no longer align with the interest of ESVS.