



# Personal Data Protection Policy

## INTRODUCTION

BIOASTER acknowledges the importance of protecting Your Personal Data (referred hereafter as “Personal Data”) as We know that you value the way Your Personal Data is processed. This “Personal Data Protection” policy (referred hereafter as “Policy”) explains how BIOASTER collects and processes Your Personal Data. It contains information on the purposes for which We collect the Personal Data, which type of Data is collected, how We process it. It also presents Your Rights as well as how to exercise them in respect to BIOASTER.

Contact us at [privacy@bioaster.org](mailto:privacy@bioaster.org) for any enquiry, request, remark or if you want to exercise one of the rights linked with the processing of Your Data, as presented in Section 3 below.

It is necessary for this Policy to define the following terms:

**“Personal Data” or “Data”:** any data that can lead to Your identification, directly or indirectly, in the meaning of article 4 of the General Data Protection Regulation (GDPR).

**“We”, “Our”, “Us”:** refer to BIOASTER, as well as to its service providers located in France or abroad.

**“You”, “Your”:** refer to You, meaning any person the Personal Data of which is processed by BIOASTER.

**“GDPR”:** General Data Protection Regulation (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27th April 2016, on the protection of natural persons regarding the processing of personal data and the free movement of such data, repealing Directive 95/46/CE (GDPR) (Text of interest for the EEA), meaning the European regulation ruling, from the 25th of May 2018, the personal data protection in the European Union.

# 1 OUR COMMITMENT ON PERSONAL DATA PROTECTION

BIOASTER is committed to processing Personal Data in accordance with the regulation on Personal Data protection, and especially in compliance with the GDPR. We are committed to complying with the following principles:

- You have no obligation to share with us the Personal Data that we ask for. However, some specific data may be required to access some services or information. Thus, if You decide not to communicate this specific Data, it is possible that You may not access this information or some of these services.
- We collect and process your Data only for purposes described in this Policy or for additional specific purposes of which You have been informed and/or to which You have agreed.
- We follow the principle of Personal Data collect minimization: it means that we only collect Data necessary for planned uses and processes, without collecting superfluous Data.
- If Personal Data that we own is not longer of use for the processing of personal data that we perform and if we are not required by any legal obligation to keep them, we will do everything to delete or destroy them, or to render them anonymous.

Your Personal Data will not be shared, sold, licensed or disclosed for purposes other than the ones described in the Policy. As described in Section 2's Chart, We may notably have to share Your Data with partner organisations while planning events.

However, we may transfer Your Data for purposes other than the ones described in the Policy, in cases where it is required by the law and governmental authorities.

We will not transfer your Data out of the European Union's territory. If that were to be the case, We will do everything we can do so that this international Data transfer is done in respect of GDPR's articles 48 and 49, especially by asking for Your consent before the transfer.

## 2 WHAT KIND OF PERSONAL DATA DO WE COLLECT?

The type of Personal Data that We collect varies depending on the Purpose for which the Data is collected.

The Chart below explains how BIOASTER processes your Personal Data.

## PERSONAL DATA PROCESSING CHART

PROCESSING FILE	PROCESSING PURPOSE	COLLECTED DATA	DATA RECIPIENT/USER	CONSERVATION PERIOD	LEGAL GROUNDS, INTEREST PURSUED AND SOURCES OF THE DATA WHEN NOT COLLECTED WITH YOUR CONSENT
Information, updates and news	Inform BIOASTER's partners and the community on: <ul style="list-style-type: none"> <li>• Updates on technological research;</li> <li>• Updates on Healthcare scientific &amp; technological research;</li> <li>• Updates on BIOASTER's or its partners' activities</li> </ul>	<ul style="list-style-type: none"> <li>• First Name</li> <li>• Last Name</li> <li>• Company or organization</li> <li>• Position</li> <li>• Professional email address</li> <li>• Professional address</li> <li>• Professional landline and/or cellphone</li> <li>• Nature of the interactions with BIOASTER</li> </ul>	BIOASTER's management and collaborators. BIOASTER's informatic safety service provider. BIOASTER's communications agency.	The Data is kept for three years starting from the collection or from the last contact with the person.	<p><b>Legal grounds:</b> Article 6.1 f), pursuit of a legitimate interest.</p> <p><b>Pursued interest:</b> make BIOASTER and its outcomes known, promote Healthcare technological research and innovation.</p> <p><b>Sources of the Data:</b> Public data available on the internet or given by You to management or employees of BIOASTER.</p>
Invitation for events such as congresses, lectures, study days, meetings, breakfasts, celebrations...	Invite BIOASTER's partners and potential partners to events organised by BIOASTER only or in collaboration with partnering organisations.	<ul style="list-style-type: none"> <li>• First Name</li> <li>• Last Name</li> <li>• Company or organization</li> <li>• Position</li> <li>• Professional email address</li> <li>• Professional address</li> <li>• Professional landline and/or cellphone number</li> <li>• Nature of the interactions with BIOASTER</li> </ul>	BIOASTER's management and collaborators. BIOASTER's informatic safety service provider. BIOASTER's communications agency. Service providers in charge of planning events. Partners with which BIOASTER plans events.	The Data is kept for three years starting from the collection or from the last contact with the person.	<p><b>Legal grounds:</b> Article 6.1 f), pursuit of a legitimate interest.</p> <p><b>Pursued interest:</b> make BIOASTER and its outcomes known, promote technological research and innovation in Healthcare, produce meetings and debates on Healthcare technological research.</p> <p><b>Sources of the Data:</b> Public data available on the internet or given by You to management or employees of BIOASTER.</p>
Invitation for professional presentation meetings at BIOASTER	Offer research collaborations, technological research and innovation activities to new partners	<ul style="list-style-type: none"> <li>• First name</li> <li>• Last name</li> <li>• Company or organization</li> <li>• Position</li> <li>• Professional email address</li> <li>• Professional address</li> <li>• Professional landline and/or cellphone number</li> </ul>	BIOASTER's management and collaborators. BIOASTER's informatic safety service provider. BIOASTER's consultants.	The related Data is kept for three years starting from their gathering or from the last contact with the person.	<p><b>Legal grounds:</b> Article 6.1 f), pursuit of a legitimate interest.</p> <p><b>Pursued interest:</b> make BIOASTER and its outcomes known, develop BIOASTER's activities.</p> <p><b>Sources of the Data:</b> Public data available on the internet or given by You to management or employees of BIOASTER or its partners.</p>
Identification du fichier de traitement	Finalité du traitement	Données collectées	Destinataires / utilisateurs des données	Durée de conservation	Base juridique, intérêt poursuivi et sources des données lorsque les Données n'ont pas été collectées par Votre contentement

## PERSONAL DATA PROCESSING CHART

<p>Set up contracts to which BIOASTER is a party with You or with the organisation You represent, or set up precontractual measures in order to conclude a contract.</p>	<p>Carry out the contract</p>	<ul style="list-style-type: none"> <li>• First name</li> <li>• Last name</li> <li>• Company or organisation</li> <li>• Position in the company/organisation</li> <li>• Professional email address</li> <li>• Professional address</li> <li>• Professional landline and/or cellphone number</li> </ul>	<p>BIOASTER's heads and collaborators. BIOASTER's informatic safety service provider. BIOASTER's subcontractors in charge of carrying out some obligations with Your consent. BIOASTER's consultants.</p>	<ul style="list-style-type: none"> <li>• Your data is kept during the precontractual period or the contractual period between BIOASTER and You or Your organisation.</li> <li>• After that, the Data is archived for the duration during which BIOASTER's liability could be questioned or during which a protection of the results obtained during the research project is required.</li> </ul>	<p><b>Legal grounds:</b> Article 6.1 b), performing a contract to which BIOASTER and You or Your organisation are parties or which is being negotiated between BIOASTER and You or Your organisation.  <b>Pursued interest:</b> Carrying out the contract or setting up contractual measures.  <b>Sources of the Data:</b> Data given by You during the performance of a contract or during the contract's negotiation.</p>
<p>Create a Resume database</p>	<p>Research a possible match between future positions and archived profiles.</p>	<ul style="list-style-type: none"> <li>• First name</li> <li>• Last name</li> <li>• Personal email address</li> <li>• Personal address</li> <li>• Personal landline and/or cellphone number</li> <li>• Information given in the resume such as: training, professional experiences, areas of interest.</li> </ul>	<p>BIOASTER's managers and collaborators concerned by your profile. BIOASTER's informatic safety service provider. BIOASTER's subcontractors in charge of accompanying BIOASTER in HR.</p>	<p>Two years starting from the date the resume is sent to BIOASTER or its service provider</p>	<p><b>Legal grounds:</b> Article 6.1 f), pursuit of a legitimate interest.  <b>Pursued interest:</b> Identify profiles of interest for skill management.  <b>Sources of the data:</b> given by You to management or collaborators of BIOASTER.</p>
<p>Clinicians' database</p>	<p>Know clinicians' expertises to be able to contact them for future R&amp;D projects</p>	<ul style="list-style-type: none"> <li>• First name</li> <li>• Last name</li> <li>• Professional email address</li> <li>• Professional address</li> <li>• Professional landline and/or cellphone number</li> <li>• Skills known and available publicly on: resumes, publications</li> <li>• History of the relations with BIOASTER or BIOASTER's collaborators.</li> </ul>	<p>BIOASTER's management and collaborators concerned by your expertise.</p>	<p>The related Data is kept for three years starting from the collection or from the last contact with the person.</p>	<p><b>Legal grounds:</b> Article 6.1 f), pursuit of a legitimate interest.  <b>Pursued interest:</b> Identify interesting skills to develop R&amp;D projects.  <b>Sources of the data:</b> Data available online publicly or given by You to management or collaborators of BIOASTER.</p>

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PROCESSING FILE	PROCESSING PURPOSE	COLLECTED DATA	DATA RECIPIENT/USER	CONSERVATION PERIOD	LEGAL GROUNDS, INTEREST PURSUED AND SOURCES OF THE DATA WHEN NOT COLLECTED WITH YOUR CONSENT
BIOSPECIMEN platform	Answer to requests for access to biological samples from BIOASTER researchers and researchers outside BIOASTER	<ul style="list-style-type: none"> <li>• Name</li> <li>• Company or organization</li> <li>• Professional email address</li> <li>• Professional postal address</li> <li>• Professional landline and / or mobile phone number</li> <li>• Position held within the company / organization</li> <li>• Professional website</li> <li>• Professional scientific project (s) linked to BIOSPECIMENS</li> </ul>	BIOASTER's management and collaborators managing the BIOSPECIMEN platform.	The data are kept five years after the last connection, and are then fully anonymized	<p><b>Legal ground:</b> article 6.1.a) consent of the data subject</p> <p><b>Pursued interest:</b> Respond to the needs and requests of those requesting the biospecimen biological sample database</p> <p><b>Source of the data:</b> provided by the BIOSPECIMEN platform users.</p>

# 3 YOUR RIGHTS

When We process Your Personal Data, you are entitled for several rights that you can exert at any time. These rights are explained below. Exerting the said rights require, for most of them, an action on Our part. To do so, please contact us at [privacy@bioaster.org](mailto:privacy@bioaster.org).

## 3.1 RIGHT TO INFORMATION

You have the right to obtain from BIOASTER the following pieces of information:

- The legal grounds of the processing Your Data are subjected to;
- The purposes of the processing;
- The categories of collected and processed Personal Data;
- The recipients of Personal Data;
- The transfers of Personal Data out of the European Union;
- The possibility to be informed of and object to any automated processing if a decision was taken on the basis of this processing and if it produces legal effects for You.

## 3.2 RIGHT TO ACCESS YOUR PERSONAL DATA

You have the right to obtain from BIOASTER the communication of Your Personal Data concerning Your person, as well as the information related to the origin of Your Data, except if such an access would be in contradiction with a legal or regulatory obligation.

## 3.3 RIGHT TO RECTIFICATION

You have the right to ask Us to modify, complete or update, without undue delay, the Personal Data concerning Your person, which is incorrect or incomplete.

## 3.4 RIGHT TO ERASURE

You have the right to ask BIOASTER to erase, without undue delay, Personal Data related to You when the use of this Data is no longer necessary regarding the purposes for which it was collected or when You withdraw the consent on which the processing was based.

## 3.5 RIGHT TO RETRACT YOUR PERSONAL DATA

You can, at any time, withdraw Your consent to parts of the processing set up by BIOASTER based on this consent.

## 3.6 RIGHT TO OBTAIN PERSONAL DATA PROCESSING RESTRICTION

You have the right to obtain from BIOASTER the restriction of the processing of Personal Data that is related to You when (i) the accuracy of the Personal Data is contested by You during a period enabling BIOASTER to verify the said accuracy of the Personal Data; (ii) when the processing is unlawful, (iii) when BIOASTER no longer needs your Personal Data for the purpose of the processing but they are still necessary to You for verifying, using or defending your Rights in court, (iv) You have exerted your opposition right.

## 3.7 RIGHT TO ASK BIOASTER FOR YOUR PERSONAL DATA PORTABILITY

You have the right to receive Your Personal Data in a structured format, frequently used and in a machine-readable format if we have processed Your Personal Data on the following bases:

- You gave Us your consent to process the Personal Data for a purpose or goal that We previously communicated to you;
- We processed Your Personal Data in order to enable the setting up of a contract linking us to You;
- We processed your personal data using automatized means (such as profiling).

## 3.8 RIGHT TO OPPOSITION

You have the right to oppose, at any time, for reasons related to your own situation, to BIOASTER proceeding to the processing of Personal Data related to You, except for overriding legitimate grounds or for reasons of public interests.

## 3.9 RIGHT TO INTRODUCE CLAIMS

You have the right to file a lawsuit directly to one of the control authorities such as the CNIL (French National Commission on Informatics and Liberties) regarding the way We process your Personal Data.

## 4 PERSONAL DATA PROTECTION

BIOASTER does its best to protect Your Personal Data from bad usage, any interference, damage, unauthorized access, modification or disclosure to non authorized third party. We have set up several security measures to help you protect your personal data. We especially use controlled access, firewalls and secured servers. The files in which the Personal Data is kept are access limited. The servers on which We keep Your data are located in France and each BIOASTER manager or collaborator is personally bound by a confidentiality obligation.

[bioaster.org](https://bioaster.org)