

# Privacy and Cookie Statement FIP

(version 2018-1)

## 1. Introduction

We, the International Pharmaceutical Federation (hereafter: "FIP")<sup>1</sup> value your privacy. If you visit our website or we provide you with our services we may request you to provide information that includes your personal data. We may also receive your personal data from third parties (such as member organizations).

As we are an association that is established in the Netherlands we process your data in accordance with privacy laws that apply in the Netherlands, including the General Data Protection Regulation ("GDPR") which applies to all our processing activities, regardless of whether or not the processing takes place in the European Union.

The purpose of this Privacy Statement is to be transparent on the processing activities that FIP undertakes with regard to the personal data of individuals outside its own organization.

This Privacy Statement is subject to changes from time to time, for example as a result of changes in the law or changes to FIP's processing activities. We will always publish the most recent version of the Privacy Statement on our website so we advise you to consult it regularly.

## 2. Processing activities and purposes

The purposes of our processing activities are dedicated to our overall mission as a non-profit organisation: "to improve global health by advancing pharmaceutical education, pharmaceutical sciences and pharmaceutical practice thus encouraging, promoting and enabling better discovery, development, access to and responsible use of appropriate, cost-effective, quality medicines worldwide".

In this paragraph we will set out the purposes of our processing activities under 2.1 up to and including 2.4, explaining which personal data we process for which purpose.

### 2.1 Providing membership benefits to FIP members

Both organisations (representing pharmacists, pharmaceutical scientists or academic institutes) as well as individuals (individual pharmacists, pharmaceutical scientists, pharmaceutical educators, pharmacy students and other individuals interested in the activities of FIP) may apply for membership of FIP. They will be offered a membership agreement. Under the membership agreement FIP is obliged to keep individual members as well as elected officers and/or staff members of member organisations updated on developments in the pharmaceutical field.

The processing activities that FIP undertakes to that effect include: sending newsletters and other publications (reports, journals, presentations) on pharmaceutical topics by email, providing access to the content on the FIP website, storing login data for that content, offering the opportunity to publish contact details on the FIP network to connect with other professionals, offering invitations to educational events by email and collecting data, information and opinions by sending surveys and sharing the results.

The personal data that we (may) process in this regard are names, (email) addresses, country of residence, photos, dates of birth, phone numbers, gender, job titles, social media profiles, fields of interest, bank account and credit card information, and login details.

### 2.2 Organise congresses and educational events

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<sup>1</sup> registered as the association with full legal capacity "Fédération Internationale Pharmaceutique/ International Pharmaceutical Federation (FIP)" at the Chamber of Commerce in the Netherlands under number 40410354

We organise congresses and educational events such as symposia, conferences and webinars to extend the knowledge of professionals working in the pharmaceutical field, to keep them updated on new developments, to provide experts with a stage to share their ideas and knowledge, and to provide a platform for professionals to meet, either personally or online.

The processing activities that FIP undertakes for this purpose include collecting personal information of subscribers, registering their online subscription, collecting payments from them, keeping them updated on the specifics of events by email, placing them on a visitors' list and offering them the opportunity to register as a FIP member or to subscribe to FIP newsletters.

The personal data that we (may) process in this regard are names, (email) addresses, country of residence, photos, dates of birth, phone numbers, gender, job titles, social media profiles, fields of interest, bank account and credit card information, and login details.

### 2.3 Informing website visitors of information on the pharmaceutical field and the activities of FIP

In accordance with its mission to advance education, sciences and practices in the pharmaceutical field, FIP aims to inform both pharmaceutical professionals as well as the general public. Information specific to members is offered in restricted areas of the website.

The processing activities that FIP undertakes to that effect include publishing information on developments, events, projects and awards on its website, accessible by the URL: [www.fip.org](http://www.fip.org). That information may contain personal data, such as names, job titles, business email addresses, photos and videos. On the FIP website, hyperlinks are placed to the congress website of FIP, where personal data for the purpose, mentioned under 2.2. are collected. FIP may also upload personal data to a social media platform such as YouTube and place a hyperlink to such third party platform on its website.

The personal data that FIP (may) process in this regard are names, (email) addresses, country of residence, photos, video images, job titles.

### 2.4 Marketing of FIP membership, webinars, congresses and other activities

In order to create awareness among the audience that (may) take an interest in FIP membership and activities (as referred to under 2.2), FIP promotes that membership and those activities.

The processing activities that FIP undertakes to that effect include:

- a) sending newsletters to members, visitors of FIP events and other subscribers to the newsletter;
- b) uploading email databases in selected social media platforms to match email addresses against email addresses of users of such social media platforms to send targeted advertisements;
- c) tracking the behaviour on FIP's websites of the users of the social media platforms, mentioned under b) (further information on this processing activity can be found under paragraph 3 ("Facebook pixel")).

The personal data that FIP processes in respect of the processing activities under a) are (in case of non-members): names and email-addresses. In the future, FIP may request subscribers to its newsletters to inform FIP on specific fields of interest within the pharmaceutical field and add that information to the other personal data of a subscriber and use it to tailor the information in the newsletter automatically to the interests of such subscriber.

The personal data that FIP processes in respect of the processing activities under b) are email addresses of members, visitors of FIP events and subscribers to the newsletter.

### 3. Cookies

Cookies are small files that are installed on your computer, mobile phone or tablet through your web browser. The cookies we install when you visit our website <https://www.fip.org> may be divided into first party cookies (that we install) and third party cookies (that are installed by third parties through our website).

If cookies are installed for commercial purposes (such as tracking online behaviour of an individual), they are considered to be used to collect personal data (such as IP-addresses, online behaviour). Other than social media plugin cookies (see below) and the “Facebook pixel” (see below), FIP installs non-commercial, “functional/technical” cookies only. Such cookies are necessary to run certain functionalities of our website, such as a login functionality, an online registration form or payment tools.

We use Google Analytics, a web analytics service provided by Google Inc. (“Google”), for benchmarking purposes and to measure the number of visits and the parts of the website that are the most popular among our website visitors. This information, including your IP-address, is used to provide aggregated and statistical information on the use of our website in order to improve its content and your user experience. Google may transmit and store your data on servers in the United States. Google adheres to the [EU/US Privacy Shield](#) which ensures an adequate level of protection for the processing of personal data by Google.

FIP has followed the [manual of the Dutch Data Protection Authority](#) in order to ensure that Google Analytics is used in a privacy friendly manner. This means that we have instructed Google to remove the last three digits of your IP-address (“Anonymize IP”) and we have disabled the standard settings to share data with Google. Furthermore, FIP has concluded a data processing addendum with Google and FIP does not use other Google services in combination with the Google Analytics cookies.

You can prevent Google’s collection and use of the Google Analytics data by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout>.

We also use social media plugin cookies (Facebook, LinkedIn, Twitter). Such cookies enable you to share content on the FIP website within a social medium platform. Through the use of cookies, however, such platforms may also track your visit to our website, even if you have not clicked the button.

In order to measure the results of campaigns on Facebook (as mentioned under subparagraph 2.4 b) and 2.4 c) FIP installs the so-called Facebook pixel on the devices of Facebook users that are directed to (a subpage of) a FIP website after clicking an advertisement on Facebook. FIP uses the Facebook pixel to track, on an aggregated level, the behaviour of that category of website visitors on the website.

For the sake of conciseness and to prevent the information on the use of social media plugin cookies published here from being outdated, we prefer to inform you on the specific cookies that the social media platforms use by referring to their respective cookie statements:

Facebook, general:

<https://www.facebook.com/policies/cookies/>

[Facebook on plugin cookies/buttons:](#)

<https://www.facebook.com/help/206635839404055?helpref=related>

LinkedIn:

<https://www.linkedin.com/legal/cookie-policy>

[Twitter:](#)

<https://help.twitter.com/en/rules-and-policies/twitter-cookies>

Clicking on hyperlinks placed on our website may direct you to third party websites (such as the websites of YouTube, Vimeo, MCI-group, Worldpay). For information on the use of cookies on those websites we refer to the cookie statements on those websites.

By adjusting your browser settings you can prevent cookies from being installed on your computer. This may, however, affect the proper functioning of (certain) features of our website.

#### **4. Legal basis of the processing activities**

Privacy laws permit the processing of personal data only if the party responsible for the processing can rely on a legal basis.

The legal basis for the processing activities, mentioned under 2.1 is: “the processing is necessary for the performance of a contract with the data subject” (if the data subject is a member that is an individual person) or “necessary for the purposes of the legitimate interests pursued by the controller” (if the data subject is an elected officer and/or staff member of a member organisation. The legitimate interest is that FIP, on the basis of the agreement, is obliged to provide stakeholders and contact persons with relevant information.

The legal basis for the processing activities mentioned under 2.2 is: “the processing is necessary for the performance of a contract with the data subject” (the agreement on the basis of which an individual is entitled to attend a congress or event, organised by FIP).

The legal basis for the processing activities mentioned under 2.3 is: necessary for the purposes of the legitimate interests pursued by the controller. The legitimate interest is that by publishing content on its website or other publications that are relevant for the pharmaceutical profession, FIP is contributing to its overall mission, mentioned under 2.

The legal basis for the processing activities mentioned under 2.4 a) of this Privacy Statement is consent (in accordance with the requirements that apply to unsolicited electronic communications for purposes of direct marketing).

Subscribers to our email newsletters will be offered the opportunity to unsubscribe from our mailing list(s) each time they receive an e-mail. Members of social media platforms that “like” or “follow” FIP on social media platforms can unsubscribe from receiving advertisements by changing their profile settings on that social media platform. From that moment on they will still receive newsletters but no longer receive advertisements within the specific social media platform.

The legal basis for the processing activities mentioned under 2.4 b) and 2.4 c) of this Privacy Statement is: necessary for the purposes of the legitimate interests pursued by the controller. Our legitimate interest is that by promoting membership and activities of FIP we can fund our activities and contribute to the overall mission of FIP as set out under paragraph 2 (intro).

#### **5. Recipients of personal data**

If you are a FIP member or elected officer and/or staff member of a member organisation, and if you use the FIP Network feature on the restricted part of the website and opt in to be found by other members, the data that you provide will be shared with other members who opt in.

Your visit to our website may be tracked by the social media platforms of which we have published “share” buttons on the FIP websites. Those platforms have determined their own purposes for processing your data and are independently responsible for that processing. For further information we refer to the respective privacy policies on the websites of those platforms.

If you apply for membership or subscribe to a congress or other educational event, your data are shared with the companies that render services to FIP in the field of payment handling, event management support, email marketing or advertising.

These companies qualify as our *processors*, along with the companies that provide us with IT services such as hosting of our databases and telecommunication services. These companies process your data on our instruction and for our purposes only. FIP has entered into agreements with these processors on the basis of which they are bound to confidentiality obligations and the obligation to take appropriate technical and organizational security measures to protect your data against loss, or unauthorised access. The processors have no access to your personal data, unless access is necessary for the execution of their services to us.

Your personal data are stored on servers that are located in the European Union or Switzerland. Switzerland is acknowledged by the EU authorities as a country with an “adequate level of protection” of personal data.

Personal data that are used for the purpose, referred to under subparagraph 2.4 may also be transferred to and stored on servers in the United States and other countries by processors that are located in the United States. These processors participate in the Privacy Shield Framework, which means that they qualify as organisations that ensure an “adequate level of protection” for the personal data that they process.

## **6. Retention period**

Your personal data are stored no longer than necessary for the purposes mentioned under 2.

The aspects that are taken into account when retention periods are set by FIP are: the duration of the agreement between FIP and an individual, statutory retention periods, limitation periods for bringing legal actions, the necessity of storage for later reference (archiving purpose).

This means that:

- If you are a member of FIP: your data will be retained for a period of 5 (five) years from confirmation of cancellation of your membership by FIP;
- If you have visited a congress or other FIP event: your data will be retained for a period of 5 years after the date of your last visit;
- If you are a subscriber to our newsletter(s) or if you follow us on a social media platform: your data will be retained until you have unsubscribed from the newsletter;

unless mandatory law obliges us to retain your data for a longer period, you request FIP to retain your data for a longer period or a legal dispute between you and FIP has arisen within the retention period, in which cases FIP will retain your data until the reason for extension of this period no longer exists.

## **7. Your rights**

Privacy laws grant you certain rights with regard to the processing of your personal data. These rights are: the right to access to and rectification or erasure of the data and restriction of or objection against the processing as well as the right to data portability. We will briefly explain these rights here.

The *right to access* means that FIP must let you know, on your request, which of your personal data we process.

The *right to rectification* means that when the data we process are incorrect, we have to rectify them on your request.

The *right to erasure* means that when we, given the necessity of the processing in relation to its purpose, process too many, too little or irrelevant personal data and you cannot erase the data yourself, you can request us to do this.

The *right to restriction* means that when you:

- hold the opinion that the data are incorrect or that the processing of the data is unlawful or unnecessary but the data cannot be erased in relation to your legal position; or
  - have objected against the processing (see hereafter)
- you can request us to suspend the processing.

Suspension means we can only - apart from exceptions - *store* the data (without your consent) until it is clear whether your opinion is correct. The same applies to processors, who we must inform on the suspension.

The *right to objection* means that you can, at any time, object to the processing activities based on “legitimate interest” (see under 4). We will then discontinue the processing.

The *right to data portability* means that you can request us, at the termination of your agreement with us, to provide you with the data that we received from you in a structured, commonly used and machine-readable format.

If you want to make one of the foregoing requests you can send it to us by email to: [privacy@fip.org](mailto:privacy@fip.org). We will respond to your request within a month. We will let you know what the possible consequences are of honouring your request (such as not being able to provide a service). If we hold the opinion that we have valid reasons to refuse your request we will inform you of those reasons in our response.

Finally, we point out that if you hold the opinion that we, by processing your personal data, act in breach of the law, please let us know. We will then try to find a solution to meet your objections. If we are not able to solve the matter with you, you can file a complaint with the Dutch Data Protection Authority (we refer to its website for more information: <https://autoriteitpersoonsgegevens.nl>).

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