

# GENERAL DATA PROTECTION REGULATION

## OSTEOPATHIC EUROPEAN ACADEMIC NETWORK

### 1. GENERAL

In this privacy policy, you will find out which personal data we, the Osteopathic European Academic Network (e.V.), process in an automated manner. The manner in which, and for what purpose we collect the data, and the rights you, as affected persons, have.

### 2. RESPONSIBLE

Responsibility for the data lies with the Osteopathic European Academic Network (OsEAN), Frimbergergasse 6, A-1130 Vienna, Non-Profit Association, ZVR-Number: 338998549

The representative of the Organisation is the President: Jöry Pauwels, [jory.pauwels@osteopathy.academy](mailto:jory.pauwels@osteopathy.academy)

c.o. OsEAN Office, Frimbergergasse 6, 1130 Vienna, Austria Tel: 00 43 1 879 38 26 47

### 3. COLLECTION AND PROCESSING OF PERSONAL DATA

The protection of personal data is very important to us. Your personal data will therefore only be processed to the extent that this is permitted by law and required for the fulfillment of the respective purpose (membership management, administration of students, fulfillment of legal obligations, sending of information material and advertising).

The following personal data are collected and processed as part of our activity for the following purposes:

#### a. For the administration of employees

To administer the contracts with our employees, including requirements for salary transfers and the registration with the responsible social insurance carriers for the legal basis of the contract fulfillment.

- Surname
- Address
- Phone
- E-mail address
- Social Security Number
- Date of birth
- Bank details

## b. Management of members

Data of persons working at member schools are saved for the purpose of communication.

- Surname
- e-mail address
- position at the school
- CVs \*

The thesis is submitted during the application process. They are saved for an indefinite time period.

## c. Administration of students

We process the following data from students at member schools of our organization for the purpose of administering Student Exchange Program.

- Surname
- gender
- Date and Place of Birth
- Nationality
- Address
- Telephone Number
- email
- Year of education at home school
- Student Language Competence
- Emergency Contact
- Surname
- Relation to Student
- Address
- Telephone Number
- Home school (sending institution)
- Host school (Receiving Institution)

## d. Management of teachers

We process the following data from Osteopathy Teachers at member schools of our Organization for the purposes of managing Teacher Exchanges / Teacher Database, Examiner Exchange and Teacher Training.

### 1) Teacher Exchange / Teacher Database

- Surname
- School (employer)
- Country & City
- Language
- Teaching Topic & Specialty
- Number lecture hours \* (Applicable only for Teacher Database)

### 2) Examiner Exchange

- Surname
- school (employer)
- Language
- Examiner since
- Subjects
- email

### 3) Teacher Training (Module leader)

- Surname
- email
- Short CV

## e. Website registrations

- Surname
- email

## f. Events

There are two types of events that require registration: **All members live meetings** and the **Open Forum**. For this we manage the following data:

- Surname
- Formal Title
- email
- Job Title
- Institute (employer)
- Diet
- CV + Picture (only for Presenters at the Open Forum)

### g. To send information

To send information about services, courses and events of our Association, we process the following data, which we have collected from registrations for one of our events:

- Surname
- E-mail address

In doing so, we use the following communication channels, if you have provided this and given us permission to use it: E-Mail.

You can unsubscribe at any time by clicking on the link received in e-mail.

### h. Photo shoot at events

We have a legitimate interest in taking pictures and publishing them on our website for the purposes of marketing events and courses. However, photographs that make impinge on a person's personal sphere of life are not taken.

You have a right to object to our processing and publication of these photos at any time, you should notify us (by e-mail), if you wish to object to our usage.

## 4. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

Your personal data will not be disclosed to third parties, except

- if we are legally obliged to do so,
- to authorized medical personnel in case of medical emergencies.
- By your express written consent

## 5. DATA PROCESSING ON BEHALF

When we hire a processor, we remain responsible for the protection of your personal information.

Therefore, we only hire external processors to perform activities necessary to deliver our services, such as IT service providers to operate and maintain our server and network infrastructure, namely domain factory or mailing service provider for sending newsletters, namely Sparkpost. These have committed themselves to comply with the applicable data protection regulations. A contract processing contract was concluded in accordance with Art. 28 GDPR.

We primarily use contract processors within the European Union. We will only use processors outside the European Union if (i) there is a European Commission adequacy decision for the third country concerned or (ii) we refer to the standard contractual clauses of the European Commission or (iii) if appropriate guarantees, e.g. the EU / US Privacy Shield with which you have a third country or (iv) we have agreed binding internal data protection rules with the processor.

You can request more information on the commissioners commissioned by us at [office@osean.com](mailto:office@osean.com).

## 6. DURATION OF PROCESSING

We process your personal data - if necessary - for the duration of the contractual relationship or as long as you are registered with us as members.

After completion of the contract, your data will be stored until expiry of the statutory retention periods applicable to us and any statute of limitations and claims for damages and, in addition, until the termination of any legal disputes in which the data are required as proof.

Personal data of students who have participated in Student Exchange will be stored for a period of 5 years for evaluation and statistics. In addition, we only save the numbers of students exchange and between which schools the exchanges occurred.

Personal data of students who have applied for a Student Research Award will be stored for an indefinite period or until the consent is revoked in writing by the person. The consent can be revoked at [office@osean.com](mailto:office@osean.com).

Employee data will be deleted by us after the expiration of the statute of limitations, whereby those data, which are necessary for the production of a service certificate, are stored for 30 years, in order to be able to fulfill the legal right of the former employees on a service report within 30 years.

Personal data from our customer base we delete after 10 years from the last contact.

We store data which you have provided us for marketing and information purposes, such as for sending a newsletter, until you object to the sending of the same or revoke any consent given for the purpose of sending it.

## 7. DATA SECURITY

We use technical and organizational security measures to protect your personal data against accidental or intentional manipulation, loss or destruction and against access by unauthorized persons. Our security measures are continually being improved in line with technical progress.

## 8. YOUR RIGHTS

With regard to the processing of your personal data, you may claim the following rights under the General Data Protection Regulation and the National Data Protection Act:

### a. right

You can request confirmation from us as to whether and to what extent we process your data. This confirmation contains information about the purposes for which your data is processed, the categories of personal data processed, the recipients or categories of recipients of the personal data, the duration of the data processing.

### b. Right to rectification

You may at any time require that we correct or complete any relevant, incorrect or incomplete information.

### c. Right to delete

You may require us to delete your personal information if we improperly process it, if the processing interferes disproportionately with your legitimate interests, if your personal information is no longer necessary for the purposes for which it was collected or if you have revoked your consent. Please note that there may be reasons for an immediate cancellation, such as in the case of statutory retention requirements.

### d. Right to restriction of processing

You may require us to restrict the processing of your data if

- You deny the accuracy of the data for a period of time that allows us to verify the accuracy of the data;
- the processing of the data is unlawful, but you reject a deletion and instead demand a restriction of the use of data;
- we no longer need the data for its intended purpose, but you still need that data to assert, exercise or defend your rights, or
- You have objected to the processing of the data.

This data is processed from the request for restriction only with individual consent or for the assertion and enforcement of legal claims.

#### e. Right to data portability

You may require us to provide you with the information you provide to us in a structured, common and machine-readable format, provided that

- we process this data on the basis of a consent given or revocable by you or for the performance of a contract between us, and
- this processing is done using automated procedures.

#### f. right to

You may, at any time, object to the processing of personal data relating to you in order to safeguard our legitimate interests or a third party for reasons arising out of your particular situation. Your data will not be processed after the opposition unless there are compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or the processing is for the purpose of enforcing, pursuing or defending legal claims.

The sending of advertising you can contradict at any time without giving reasons.

#### g. right of appeal

If you believe that we violate National or European data protection laws when processing your data, you can always contact us. Of course, you also have the right to contact the relevant data protection authority and from 25.05.2018 also to the supervisory authority within the EU.

#### h. Asserting your rights

In order to assert one of the aforementioned rights, please use the following contact options:

OsEAN – Frimbergergasse 6 – 1130 Vienna – Austria

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- Email to: [office@osean.com](mailto:office@osean.com)
- Letter to: Osteopathic European Academic Network (OsEAN)  
Daniela Mutafova  
Frimbergergasse 6  
1130 Vienna

If we cannot determine your identity based on the data we hold, it may be necessary for us to request additional information to determine your identity (eg photo ID). Any questions you may have will help protect your rights and privacy.