

Data Protection Notice for Customers, Suppliers, potential Suppliers and any Individuals providing Service to LIH

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The Luxembourg Institute of Health (**LIH**), 1A rue Thomas Edison L-1445 Strassen, Luxembourg (“**we**”) is committed to the protection of your personal data in accordance with data protection legislation, especially the General Data Protection Regulation EU 2016/679 (the “**GDPR**”).

This Data Protection Notice is addressed to contact persons of suppliers, potential suppliers and customers of LIH (e.g. their representatives, employees or other collaborators) as well as to any individuals providing an *ad hoc* service to LIH (e.g. Guest Speakers to LIH’s lectures or seminars, consultants and other individuals working on their own account). It provides You with detailed information relating to the protection of your personal data by us.

1. Who is the controller of your personal data?

LIH is responsible as a data controller for collecting and processing your personal data in the context of our business relationship with your employer (our supplier or our customer, depending on the context) or of our collaboration with You.

The purpose of this Data Protection Notice is to inform You about which personal data we collect, the reasons why we use and share such data, how long we keep it, what rights You have and how You can exercise them.

2. Personal data processed, purposes and legal bases of processing

According to the nature of your relationship with LIH, we process different categories of personal data, for different purposes and under different legal bases. In the table below you will find the details regarding the processing of your personal data by LIH depending on the category to which you belong:

Purpose of the processing	Categories of personal data processed	Categories of data subjects					Legal basis for the processing
		Collaborators of Potential Suppliers	Collaborators of Suppliers	Collaborators of Customers	Guest Speakers	Physical persons providing services to LIH	
Assess quotes requested by LIH or offers submitted to LIH’s public tenders	<ul style="list-style-type: none"> identification data (title, name, surname) professional data (company/organisation name, job title, seniority level, telephone number, email address and postal address) educational data (CV, professional qualifications, spoken languages) 	√	×	×	×	×	Legitimate interest of LIH (art. 6(1)(f) GDPR), notably for assessing the suitability of a potential supplier with a view to enter into a business relationship

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<p>Verify the visibility of LIH's public tenders (extraction via the portal "Marchés publics" of a list of persons who downloaded this tender)</p>	<ul style="list-style-type: none"> identification data (name, surname) professional data (company, email address, telephone number) 	✓	✗	✗	✗	✗	Legitimate interest of LIH (art. 6(1)(f) GDPR) to verify the visibility and the audience of a public tender it published
<p>Execute the contract with the physical person providing services to LIH (sign the contract, communicate with the person, proceed to payment for the services provided)</p>	<ul style="list-style-type: none"> identification data (title, name, surname) professional data (job title, telephone number, email address and postal address) educational data (CV, professional qualifications, spoken languages) bank account details (bank account number, IBAN) 	✗	✗	✗	✗	✓	Performance of the contract with the individual providing services to LIH (art. 6(1)(b) GDPR)
<p>Execute the contract between LIH and its Suppliers (sign the contract, communicate with representatives, employees or other collaborators of the Supplier for topics related to the business relationship)</p>	<ul style="list-style-type: none"> identification data (title, name, surname) professional data (company/organisation name, job title, telephone number, email address) 	✗	✓	✗	✗	✗	Legitimate interest of LIH (art. 6(1)(f) GDPR), for signing and executing the contract with its Suppliers
<p>Reimburse the expenses occurring for an <i>ad-hoc</i> service provided to LIH (reimbursement of travel expenses of Guest Speakers occurring in the course of their invitation to events organised by LIH, such as</p>	<ul style="list-style-type: none"> identification data (title, name and surname) professional data (company/organisation name, job title, email and address) bank account details (e.g. IBAN) data related to expenses occurred in the course of the event (amount, type and date of expense, and supporting documentation such as transportation or meal receipts) 	✗	✗	✗	✓	✗	Performance of the (implicit) contract with the Guest Speaker (art. 6(1)(b) GDPR), concluded following the acceptance of the Guest Speaker to provide an <i>ad hoc</i> service to LIH according to

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lectures or seminars) ¹							the terms agreed.
Execute the contract between LIH and its Customers (sign the contract, communicate with representatives, employees or other collaborators of the Customer for topics related to the business relationship and include them as contact person to the invoices issued)	<ul style="list-style-type: none"> identification data (title, name, surname) professional data (company/organisation name, job title, telephone number, email address) 	×	×	√	×	×	Legitimate interest of LIH (art. 6(1)(f) GDPR), for signing and executing the contract with its Customers
Assess the quality of the services provided by LIH to its Customers (send customer satisfaction surveys)	<ul style="list-style-type: none"> identification data (name, surname, title) professional data (company, country, email address) any personal data that may be voluntarily disclosed in the open field of the survey 	×	×	√	×	×	Legitimate interest of LIH (art. 6(1)(f) GDPR), to receive feedback from its Customers, via surveys, on their satisfaction of the services provided by LIH in order to improve their quality

3. Who do we share your personal data with?

Your personal data will be collected and processed primarily by our members of staff who have a legitimate need to process it for purposes set out above (our finance and purchase department and potentially our scientific teams).

¹ Please note that when you are invited as Guest Speaker to our events, we may process further personal data about You (e.g. image). Details on this processing are available in the Data Protection Notice entitled "PRIVACY NOTICE IN CONNECTION WITH EVENTS' MANAGEMENT".

We will also communicate your personal data to:

- law enforcement or other government and regulatory bodies or agencies, only upon request and to the extent permitted by law,
- certain regulated professionals such as lawyers or auditors.

Please note that in order to be able to reimburse your expenses that occur in the course of your intervention as a Guest Speaker in an event organised by us, your name, bank account number and amount of total expenses will be sent to our bank in order to proceed to the payment. Your expense declaration will be accessible by our service provider for destruction of archives.

Furthermore, in order to send You our customer satisfaction surveys, your personal data (name, surname, title, company, country, email) will be shared with our service provider for the management of our customer mailing list, Sarbacane (Europe), in order to be able to distribute our survey to you.

We require all third parties to respect the security of your personal data and to process it in accordance with the law.

4. Where do we transfer your personal data?

We will not transfer your personal data to countries outside of the European Union/ European Economic Area (EU/EEA). If international transfers originating from the (EU/EEA) to a country outside the EU/EEA will occur in the future, we will update this Notice and ensure your personal data is adequately protected and we will implement appropriate safeguards in accordance with the GDPR. You can obtain more information regarding relevant safeguards we rely on by contacting our Data Protection Officer at dpo@lih.lu.

5. Security of your personal data

The processing of your personal data is carried out through IT, electronic and manual tools, with logics strictly related to the aforementioned purposes and, in any event, in compliance with the appropriate technical and organisational measures required by law to ensure a level of security that is adequate to the risk, in order to avoid unauthorised loss of, access to or modification of your data.

6. How long do we keep your personal data?

We will retain your personal data for up to 10 years after the end of our contractual relationship with our supplier/customer, your employer, or with You, where we collaborate directly with You, in order to comply with our accounting obligations.

Please note that our customer mailing list, in order to send You our customer satisfaction survey, is created on the basis of our active customers. This list will be therefore kept as long as our business relationship with our customer, your employer, is active and You do not object to the processing of your personal data in the course of the customer satisfaction surveys..

7. What are your rights regarding your personal data?

In accordance with applicable data protection law, You may exercise at any time the following rights in relation to your personal data:

- **right to access**, which enables You (according to art. 15 of the GDPR) to obtain from us confirmation of whether personal data are being processed or not and, if so, obtain access to such data; we process a large quantity of information, and can thus request, in accordance with the GDPR, that before the information is provided, You specify the information or processing activities to which your request relates;

- **right to rectification**, which enables You (according to art. 16 of the GDPR) to obtain from us the correction and/or integration of any of your personal data that are incorrect and/or incomplete;
and in certain limited cases (in which case we will analyse whether the conditions for the exercise of such rights are fulfilled):
- **right to erasure**, which enables You, in specific cases provided for by art. 17 GDPR, to obtain from us the erasure of your personal data;
- **right to restriction of processing**, which enables You, in the specific cases provided for by art. 18 of the GDPR, to restrict the processing of your personal data by us;
- **right to object**, which enables You to object to the processing of your personal data when the conditions provided for by art. 21 of the GDPR are met. Please note that you have the right to object to the processing of your personal data that it is based on legitimate interest as per art. 6(1)(f) GDPR (see table above);
- **right to data portability**, which enables You, in specific cases provided for in art. 20 of the GDPR and only with regard to the data You have provided to us, to request receipt of your personal data in a structured and commonly machine-readable format.

To exercise any of these rights, You may contact our Data Protection Officer by email at dpo@lih.lu or by postal mail at:

Luxembourg Institute of Health

Data Protection Officer

1A-B rue Thomas Edison

L-1445 Strassen

You have the right to lodge a formal complaint with the *Commission nationale pour la protection des données* (CNPD) concerning the processing of your personal data by LIH. Full details may be accessed on the complaints section of CNPD's website (<https://cnpd.public.lu>).

Changes to this Data Protection Notice

Changes may occur in the way we process personal data. In case these changes oblige us to update this Data Protection Notice, we will clearly communicate it to You, via appropriate means. The latest applicable version will always be available on our Website.