

Inspire. Engage. Transform.

Privacy Policy

We protect your privacy. This policy helps you understand how UMC collects and uses your personal information. You also get information about your rights in this regard and how you can proceed to enforce your rights. Your privacy is of the utmost importance to us at the UMC and we aim to follow current law and regulations for data protection at all times.

All personal data processed in the context of your relationship with UMC is used to provide, perform and improve UMC's products and services. Information about you are directly or indirectly disclosed by yourself or by your employer/contractor in a variety of ways, such as when registering for an account on our web, through sign-up services to webinars or similarly, when you contact our support or using UMC's services.

Privacy and security measures

Due to the importance of protecting your personal data we have taken comprehensive technical and organisational security measures to safe guard your personal data from loss, misuse, unauthorised access or disclosure, alteration or destruction.

Our employees have strict instructions to handle all personal data according to current laws and regulations for personal data protection. We further guarantee an adequate level of protection of your personal data. Our security work comprises the protection of information, IT-infrastructure, our office building as access to technical facilities, hardware and network. Processing of data is logged and checked systematically. Encryption of data is done with generally recognized and secure encryption methods. We continuously work to combat spam and viruses in our networks.

Data collected within the WHO Programme for International Drug Monitoring

VigiBase is the WHO global database of individual case safety reports (ICSRs). It contains information about suspected adverse effects of medicines, collected since 1968, by member states of the WHO Programme for International Drug Monitoring. UMC, as the WHO Collaborating Centre for International Drug Monitoring, process information in

VigiBase on behalf of the WHO and the member states in the WHO Programme. UMC is not in a position to identify and data subjects within the data, neither edit or remove any information in the database.

Data collected from visiting the website or using UMC's services

Data is information we collect and store about you and your usage of the UMC's services. We process your information to make the services available for you, but also more useful and to develop new services.

What data are we collecting?

We collect and store two types of data about you; customer data and traffic data.

Customer data is information connected to you which enables using our products and services, for example username, password and contact information (name, e-mail address, phone number and organisation information). We also have information about what products and services you have been granted access to (governed by the organisation your account is connected to) and other information you have provided in your contact with us. We include information about you, that you have provided by yourself to our support, in this category.

Traffic data is information we learn about you from your visit to the UMC website or the logged in services. We store the following traffic data: the IP address from which you access the Internet, the date and time, the Internet address of the website from which you linked directly to our site, the name of the file or the words that you searched, and the browser used to access our site. We may use this information to assess the number of visitors to the various sections of our site and system performance, and to identify problem areas.

It helps us learn about the geographical distribution of our visitors, the technology used to access our site, which services are most frequently used, how the workload of the systems is distributed, and areas of improvements.

How are we collecting your data?

We collect and process data:

- That you, or your employer (or contractor), provide us with by sending an e-mail, or by filling out a form with your personal data and submitting it through our website for the creation of your user account, or in contacts with support or license team for access of further services, signing up for training sessions, webinars or newsletters.
- Data that are created when you visit the website or login to our logged in services, when you contact us via e-mail, phone call or participate in webinars or teleconferences.
- Information collected through the usage of cookies on our website and in our logged in services from and on your browser.

What information we collect about you depends on which of our products and services you are using.

Why are we collecting this data?

As we are an organisation with basis in Sweden we need to adhere to the General Data Protection Regulation (GDPR), a European law that governs processing of personal data with the aim to protect the personal integrity. To process personal data, there must be support in the regulation, a so-called legal basis. This means that in order for our processing of your personal data to be legal:

- necessary to fulfil the agreement with you
- to fulfil a UMC legal obligation.

The processing of your data may also be done

- after a balance of interest (legitimate interest).
- due to that you have given your consent to that particular treatment.

In order to provide services and products, we need to process and manage your data. Below are examples of the purposes for which we treat your data and on the basis of which legal basis we do this.

Provision of services

We process data about you to identify you as user of our services, to grant you access to those services you have a valid user agreement for, or have signed up for, or to help provide you with the information or material that you request. We process data so that we can invoice the costs of services, manage support issues and other problems related to your use of our services.

Legal ground: Legitimate interests (customer data) and

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fulfilling agreement (customer data).

Development of services

We process data to improve and develop our operations, products and services. We may pool data together for statistical reasons. We also use third party cookies from trusted providers as Google Analytics and Microsoft Application Insights (see below), including analysis of usage that underlies our future product development.

Legal ground: legitimate interests (customer data)

Other communication of the services including direct marketing

On occasion, we may study the types of questions sent to us. These studies help us to improve our website to make it more responsive to the needs of our users. We also process information about you when providing you with information about our services, or we may analyse your support request(s) to educate staff.

Legal ground: legitimate interests (customer data) and fulfilling agreement (traffic data).

Information security and preventing misuse of services

We process data to ensure data security, prevent misuse or unauthorised access according terms and condition.

Legal ground: Fulfilling agreement (traffic data).

Where are we transferring your data?

In our status as a WHO collaborating centre for international drug monitoring we may transfer personal data received from you or your employer or contractor - the appointed organisation representing the member state in the WHO Programme for International Drug Monitoring ("Member state") to the World Health Organization for educational purposes.

We may also transfer personal data received from you or your employer or contractor - the Member State to other Member States within EU to enable marketing of products and services made for pharmacovigilance purposes developed by and for Member States.

Your rights

Knowing what data we process about you

You have, according to current law relating to personal data, the right to request information about any personal information relating to you and held by us as controller free of charge regardless of how this information is gathered. Requests for such information must be made in writing.

The subject access request must be sent to Uppsala Monitoring Centre, Box 1051, SE-75140 Uppsala, Sweden.

UMC acts both as controller and processor. UMC is only responsible for subject access requests in its role as a controller.

Correct incorrect data and object to processing

If your personal data is handled in opposition to current laws relating to personal data you have the right to ask that the personal data is corrected, blocked, deleted or restricted.

You also have the right at any time to recall an approval regards the handling of your personal data. Note however, that a recall of this type will mean that you may no longer be able to use the UMC Services. Observe that you may have got access to the UMC's services as part of your employment or contract with an organisation who has an agreement with UMC.

You always have the right to object processing of your data. When we claim legitimate interests, you need to specify what your objections are. If we still claim legitimate interest, we need to prove that our needs to process your personal data override your rights.

If the data are processed due to direct marketing you always have the right to object.

Right to be forgotten

We never save data longer than needed. This means that when the purpose of the processing of your personal data is met we will delete the data. Some data is discarded directly, others are stored for a longer time depending on the purpose of the collection of data to be used and our statutory obligations.

- User data is stored as long as you have a user account and are discarded at latest 24 months after the account was closed. Data related to legal obligations for controlling accounting are stored according to the Swedish Accounting Act and are discarded at the latest eight years after the data was gathered/created.
- Traffic data will be stored up-to 6 months for support purpose with the exception of data needed for UMC to fulfil its legal obligation according to the Swedish Accounting Act, see retention period in the paragraph here above.
- We store statistics from the traffic data for the purpose of improving our services or controlling the accuracy of our services. Statistic data may be stored up to 24 months after the data was gathered/created.
- In order to limit damage to and protect you from internet fraud, we save IP addresses so that we can search, block, and delete addresses and messages. This way we can prevent the spread of viruses, spam and trojans. IP addresses are saved for 6 months after the data was gathered.
- E-mail conversation etc with our support may be stored up-to 24 months after the data was gathered/created.

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You have the right to get your information erased without unnecessary delay if:

- The data is not needed any longer for the purpose it was collected.
- If you withdraw your consent.
- If the use of your data is for direct marketing and you off-set processing for that purpose.
- If we do not follow this policy.

Complaints

If you think that your data is not processed according to the GDPR you have the right to submit a complaint to the Swedish data protection authority.

Links to other sites

We provide links to other Internet sites that provide pharmacovigilance-related health information. Once you link to another site, you are subject to any privacy statement the new site may have. UMC does not endorse the sites to which it links.

Updates of the policy

If there are any changes to this privacy policy, we will post them here (who-umc.org/about-us/privacy-policy/) so that you are completely aware of how the changes will affect you.

How to contact us

Data subject request

UMC acts both as controller and processor. UMC is only responsible for subject access requests in its role as a controller. The subject access request can be sent to:

Uppsala Monitoring Centre
Bredgränd 7, Uppsala, Sweden
+46 18 65 60 60
privacy@who-umc.org

Data Protection team

Our Data Protection Team ensures legal processing of your data. If you have any questions or concerns about the UMC privacy statement, please contact us at privacy@who-umc.org

The Data Protection Team will also manage your requests for withdrawing consents, and support in requesting a registry extract, these issues requires a written and signed request where you clearly indicate what information you want to take part of.

Data Protection Team
Uppsala Monitoring Centre
Box 1051, SE-75140 Uppsala, Sweden

Data protection Officer

The UMC has appointed Azra Hessington as our data protection officer:

privacy@who-umc.org

Cookie policy

What is a cookie?

A cookie is a small text file that websites you visit can place on your computer in different ways to remember you and your visit as well as contribute to a better experience and functionality for you. Cookies are used on most websites and are not harmful to your computer.

In accordance with the Electronic Communications Act, which took effect on July 25, 2003, all users visiting a website with cookies must be informed that the website contains cookies, how these cookies are used and how they can be avoided. More information is available on the National Post and Telecom Agency's website (see <https://www.pts.se/>)

Why does UMC use cookies?

Our website, like many others, stores and retrieves information on your browser using cookies. This information is used to make the site work as you expect it to and it can be used to give you a more personalised web experience. The information in these cookies is solely linked to your computer (via your IP address) and your visit to UMC's website and logged in services. Some of these cookies are saved long-term on your computer (often referred to as persistent cookies) and others temporarily saved in your computer's memory and disappear when you close your browser (often referred to as session cookies).

UMC also uses third party cookies from trusted providers (see below), including analysis of usage that underlies our future product development.

Strictly Necessary Cookies

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site may not work then.

Performance cookies

These cookies allow us to count visits and traffic sources, so we can measure and improve the performance of our site. They help us know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies, we will not know when you have visited our site.

UMC's use of Google Analytics and Application Insights (third party cookie)

UMC uses Google Analytics, a commonly used product of Google, and Application Insights, a web analytics service provided by Microsoft Corporation, to generally understand how visitors of the website and UMC products and services interact with UMC. These third-party applications place a

cookie in the browser of the visitor of the web pages which allows for an analysis of your use of the site. The information generated by the cookie about your use of our website are usually transferred to a server of Microsoft or Google (may be in the US and stored there). On our behalf as a website operator, they will use this information to evaluate your use of the website, compiling reports on website activity and providing other information on website usage and internet related services to us as a website operator.

You can reject the required placing of the cookie – for example by settings in your browser which generally disable the automatic placing of cookies or adjust your browser so that cookies are blocked by Microsoft or Google. However, we would like to point out that in this case you might not be able to use all features of our website or UMC products and services to their full extent. The following additional information is collected: Operating System, Browser and Version, Screen Resolution, Approximate location of the user, IP address. We can analyse these data using various reports. All this information is anonymous statistical data and referencing these to a person is not possible. The evaluations serve only for troubleshooting and optimization of the website and the application.

If you as an Internet user specifically want to avoid being traced by Google, Google provides the following service to you: <https://tools.google.com/dlpage/gaoptout>.

Further information from Microsoft about privacy and Azure can be found at: <http://azure.microsoft.com/support/trust-center/privacy/>

How do I generally delete cookies?

If you do not agree that cookies are used, you can clear and disable cookies in your browser. In some browsers (such as Google's "Chrome") you can use in an incognito mode when the browser automatically deletes all cookies when you close it.

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Glossary

Consent - A voluntary approval (after receiving information) to allow us to process your data.

Cookies - A cookie is a small text file that websites you visit can place on your computer in different ways to remember you and your visit as well as contribute to a better experience and functionality for you. Cookies are used on most websites and are not harmful to your computer.

According to the Electronic Communications Act (2003: 389), all site visitors should be informed about what cookies are used for. More information is available on the National Post and Telecom Agency's website (see <https://www.pts.se/>)

Customer data - such as name, address, e-mail address, phone number. Also, information about, for example, what services you have and how to use them, orders, user ID, and password.

Data Controller - determines the purposes for which and the means by which personal data is processed.

Data Processor - processes personal data only on behalf of the data controller.

Data Protection Regulations - Rules on how companies and organizations can process personal data and what rights you have over your data. As from May 25, 2018, the new regulation, known as GDPR, applies within EU.

GDPR - General Data Protection Regulation - New EU Data Protection Regulation. **IP address** - When your web browser or e-mail application requests a web page or e-mail from another computer on the Internet, it automatically gives that computer the address to which it should send the information. This is called your computer's Internet protocol (IP) address. For many users accessing the Internet from a dial-up Internet service provider (ISP), the IP addresses differ every time they log on.

Legal basis - Data protection support that makes a company's processing of your data legal.

Processing (of data) -for example, collection, storage, processing, use or organization of data.

Personal data - include both customer data and traffic data. Referred to in our privacy policy as data.

Traffic data - Data generated when using our services, such as IP numbers, session information, which networks are being used.

Trojans - computer programs that pretend to be something it is not, does not spread like a virus but can cause harm or problems.

Viruses (computer viruses) - Small computer programs or program codes that copy themselves, spreads in other programs and cause problems

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