

# EMVO Website Privacy Policy

## Our Privacy Policy at a glance

**Who we are.** We are the European Medicines Verification Organisation A.S.B.L., and we process your Personal Data in the context of this Website. [See more.](#)

**Personal Data we collect and process.** We process the Personal Data that you share with us when registering, accessing or using this Website and that we automatically collect by means of cookies and similar technologies, as described in our [Cookies Policy](#). [See more.](#)

**Purposes and legal bases of the processing.** We have legal grounds to process your Personal Data for various reasons. The main reason is that we need to process your Personal Data to operate the European Medicines Verification System, the EMVS On-boarding process and this Website. We also use your data for other reasons, for example, to respond to your queries and to send you information that you have asked to receive from us or for recruitment purposes. [See more.](#)

**Sharing your Personal Data.** We share your Personal Data with service providers who provide us with assistance or support and the National Medicines Verification Organisations, mainly within the European Economic Area. [See more.](#)

**Your rights.** You have the right to access, rectify or delete your Personal Data. In certain cases, you are also entitled to other rights, such as, for example, to object to us using your data, as explained in depth below. [See more.](#)

**How to contact us.** If you have any questions or concerns about this Privacy Policy, or if you wish to exercise any of your rights, please send a request by using our contact details provided below. [See more.](#)

# Privacy Policy

## 1. Introduction

European Medicines Verification Organisation, A.S.B.L., with registered office at rue du Commerce, 1000 Brussels, Belgium, VAT BE 0638.801.022 RPR/RPM Bruxelles ("**EMVO**", "**we**", "**us**", or "**our**"), as data controller of Personal Data about you, respects your concerns about privacy and values the relationship we have with you.

EMVO's Privacy Policy ("**Privacy Policy**") describes the types of information you provide us with or we collect when you are accessing or using EMVO's website, including information relating to identified or identifiable individuals ("**Personal Data**"), for which purposes we use such Personal Data, with whom we may share it and the rights and choices available to you regarding our use of Personal Data about you. This Privacy Policy also describes how Personal Data about you are secured and how you can contact us about our privacy practices.

Please read this Privacy Policy before using or submitting any Personal Data on our website.

### **EMVO's website (the "Website")**

By accessing and using EMVO's website at <https://emvo-medicines.eu/> (the "**Website**") before using or submitting Personal Data, you confirm that you have read and that you understand the way we collect, process, use and disclose Personal Data about you as described in this Privacy Policy.

Please note that before using or submitting Personal Data, you might be also asked to confirm electronically your acceptance of this Privacy Policy. Your affirmative action in submitting the data and your use of the Website signify that you agree to the collection, processing, use and transfer of Personal Data about you as described in this Privacy Policy. Our records of your acceptance of this Privacy Policy, the date thereof, and of all future amendments to this Privacy Policy, shall be regarded as conclusive and written evidence of your consent.

### **European Medicines Verification System Information (the "EVI")**

Subscription at the European Medicines Verification System Information is the best means to receive immediate updates on all Information, Known Issues and Downtimes in the EMVS ([here](#)).

Please note that before using or submitting Personal Data, you might be also asked to confirm electronically your acceptance of this Privacy Policy by clicking on a button. By clicking on the "SUBSCRIBE" button, you acknowledge that you have read and understood how EMVO can collect, process, use and transfer your Personal Data as described in our [EMVO Website Privacy Policy](#), including receiving immediate updates by email on Known Issues, Downtimes and other important information relating to the EMVS

Note: Please be aware that by subscribing to the EVI, you consent to the activation of reCAPTCHA and the cookies associated with this service.

### **Contact us**

Please note that before using or submitting Personal Data, you might be also asked to confirm electronically your acceptance of this Privacy Policy by clicking on a button. By clicking on the "SEND" button, you acknowledge that you have read and understood how EMVO can collect, process, use and transfer your Personal Data as described in our [EMVO Website Privacy Policy](#).

You and EMVO also agree to perform your rights and obligations as part of the use of the Website (including, without limitation, the collection, use, processing, storage and maintenance of Personal Data) in accordance with all applicable data protection and privacy laws and regulations, including the General Data Protection

Regulation (EU) 2016/679 of 27 April 2016 ("**GDPR**") and applicable implementing national laws (collectively, the "**Data Protection Laws**").

This Privacy Policy makes integral part of the [Terms of Use](#) of our Website. By accepting these Terms of Use, you also consent to this Privacy Policy.

## 2. Which Personal Data we collect and process

### 2.1. Information you provide

When registering, accessing or using the Website you will provide Personal Data about you (i.e. any information that relates to you as an identified or identifiable individual), or about your employee(s), agent(s), representative(s). This Personal Data includes:

- your name and e-mail address when you subscribe to the European Medicines Verification System Information;
- your name, contact details, company and message when you use our "Contact us" form;
- your name, contact details, company details name, country of registration and VAT number) and type of organisation (parallel distributor or original pack manufacturer) when you enter our On-boarding Partner Portal;
- your CV and any information generally contained on a CV or other information that you voluntarily wish to share with EMVO if you respond to a job opportunity published on the "Career" section of the Website.

### 2.2. Automatic Information Collection

Subject to your consent where required by law, we and our third-party service providers may use a variety of technologies that collect and provide information about how the Website is accessed and used. Such information may consist of your internet browser type, operating system, service provider, the webpages you viewed, the time you viewed them and for how long, the referral website, demographic information about you (such as your age, gender, language, location and interest areas, where available) and what webpages you looked at before viewing the current page. We use this information to get a better idea of how our users interact with our Website and then tailor and improve our Website accordingly. Such information generally cannot be linked to you individually, but if we can link it to you then we treat it as Personal Data about you in accordance with this Privacy Policy.

Certain information is gathered by means of cookies. EMVO may use cookies and similar technologies on this Website as described in our [Cookies Policy](#) available on our Website. By clicking the "Accept" button or validating the selection of your cookie preferences on the EMVO "Cookie Settings" banner, you are agreeing to our use of cookies and similar technologies in line with your selection and in accordance with our Cookie Policy available on our Website. You will always be able to withdraw your consent and change your choice by using the "Cookie Settings" banner (shown below). If you disable cookies that we use, this may impact your user experience while on this Website.

## Privacy Overview ×

This website uses cookies to improve your experience while you navigate through the website. Out of these cookies, the cookies that are categorized as necessary are stored on your browser as they are essential for the working of basic functionalities...

[Show more](#)

> Necessary	Always Enabled
v Non Necessary	Disabled <input type="checkbox"/>

Any cookies that may not be particularly necessary for the website to function and is used specifically to collect user personal data via analytics, ads, other embedded contents are termed as non-necessary cookies. It is mandatory to procure user consent prior to running these cookies on your website.

[Save & Accept](#)

## 3. For which purposes and on basis of which legal bases we collect Personal Data

In certain sections of this Website you are asked to provide your Personal Data, in particular your name, contact details and other information listed in Section **Error! Reference source not found.** When we ask you to provide your Personal Data in order to give you access to any of the functions of the Website, please note that certain boxes may be marked as mandatory, to the extent this is data we need to give you access to the relevant functionality. If you choose not to provide us with these data, you may not be able to use these functionalities.

EMVO will process your Personal Data for various purposes, as described below:

Purposes of processing	Legal Basis
We may use your data to set up, manage and operate the European Medicines Verification System (" <b>EMVS</b> ") and the EMVS On-boarding process.	Your Personal Data will be processed based on our legitimate interests which consist in (i) implementing, setting up and managing, together with NMVOs and other relevant stakeholders, the EMVS in accordance with the Commission Delegated Regulation (EU) 2016/161 of 2 October 2015 supplementing Directive 2001/83/EC of the European Parliament and of the Council by laying down detailed rules for the safety features appearing on the packaging of medicinal products for human use (the " <b>Delegated Regulation</b> ") and (ii) assisting the On-boarding Partners to correctly and timely On-boarding for the EMVS On-boarding process and be able to participate to the On-boarding project.
We may use your data to organise events (e.g. webinars, trainings etc.) and to send you newsletters and other communications about the EMVS and our activities.	<p>Your Personal Data will be processed based on:</p> <ul style="list-style-type: none"> <li>▪ your consent (for example, when you subscribe to the European Medicines Verification System Information); or</li> <li>▪ our legitimate interest to manage events to which you are participating and to inform you about similar events or services similar to those provided to you.</li> </ul> <p>You can withdraw your consent or object to the processing of your data for direct marketing purposes at any time.</p>

<p>We may use your data to manage and assess your application for a job opportunity that you submit via the "Career" section of the Website.</p>	<p>Your Personal Data will be processed to the extent the processing is necessary for taking steps to enter into a contract with you at your request and for our legitimate interests in pursuing recruitment processes.</p>
<p>We may process your navigation data for the operation of our Website. Please refer to our <a href="#">Cookies Policy</a> for more details.</p>	<p>Your Personal Data will be processed based on:</p> <ul style="list-style-type: none"> <li>▪ your consent, which is collected and registered following the selection of your cookie preferences in our Cookie Settings banner; or</li> <li>▪ our legitimate interests to operate our Website.</li> </ul>
<p>We may use your data to respond to specific questions you ask us via the "Contact" section of this Website.</p>	<p>Your Personal Data will be processed on the basis of our legitimate interest in responding to requests made via the "Contact" section of this Website. This data processing may also be useful to you to the extent that it enables us to assist you and respond to your requests.</p>
<p>We may process your data for accounting, records keeping, information, claims and complaints management, including the provision of technical support and assistance to you.</p> <p>We may also use your data to fulfil other legitimate purposes disclosed to you at the time you provide your Personal Data or as permitted or required to comply with applicable laws and regulations to which we are subject.</p>	<p>Your Personal Data will be processed because the processing is necessary:</p> <ul style="list-style-type: none"> <li>▪ for the purposes of the legitimate interests pursued by EMVO which consist in operating the EMVS and related corporate activities and defending itself against potential claims; or</li> <li>▪ to comply with a legal obligation of EMVO such as tax and accounting obligations.</li> </ul>

## 4. How we may share Personal Data

For the purposes and based on the legal bases described under the Section 3 above, EMVO may need to disclose and transfer Personal Data as detailed in this Section.

When required to achieve the above purposes, EMVO may share Personal Data with:

- third party services providers acting on our behalf and under our instructions, that provide services to us, namely professional advice, assistance in events' organisation, IT and business implementation, support and HR recruiting related services and solutions as well as helpdesk and web-related services; and
- the National Medicines Verification Organisations ("**NMVOs**") who may receive the Personal Data relating to the On-boarding Partners where necessary for the purposes of the legitimate interests pursued by EMVO or the NMVOs (article 6, 1., (f) of the GDPR) to implement, manage and set up the EMVS in a timely fashion and in accordance with the Delegated Regulation, as well as other possible stakeholders that interact with EMVO and NMVOs in pursuing such purposes at European or national level.

Except as expressly set forth herein, EMVO shall not provide Personal Data about you to other third parties without obtaining your prior permission, unless it is required to do so under a statutory provision or court order. In particular, EMVO may disclose Personal Data about you in the following circumstances:

- to the competent authorities to comply with our legal obligations;
- to respond to authorised information requests from law enforcement authorities or judiciary or when otherwise required or permitted by law;

- to respond to an emergency; or
- otherwise to protect the rights, property, safety, or security of third parties, visitors to this Website or the public.

The above recipients shall be located within the European Economic Area ("**EEA**") or another country that is covered by an adequacy decision of the European Commission.

However, in the event the On-boarding Partner is located outside the EEA, your Personal Data may be transferred outside the EEA in the country where the OBP is established, where the level of protection of your Personal Data may not be equivalent as in the EEA due to the absence of an adequacy decision and appropriate safeguards for such transfer. Such transfer will be based on your explicit consent (Articles 6, 1., (a), and 49, 1. (a), of the GDPR) or another valid data transfer mechanism or derogations in accordance with applicable Data Protection Laws.

Only a limited number of individuals within EMVO (e.g., EMVO individuals responsible for the Website, for the organisation of events, etc.) will be granted access to Personal Data about you on a need to know basis.

## 5. How we protect Personal Data

EMVO takes – and requires that any third party services provider and/or processor processing Personal Data on behalf and under the instructions of EMVO takes – appropriate technical and organisational measures to protect Personal Data about you against accidental or unlawful destruction or accidental loss, misuse, unauthorized access, disclosure, alteration or destruction, and against any other unlawful form of processing of information as defined by applicable Data Protection Laws.

However, please note that no electronic transmission or storage of information is 100% secure. Therefore, despite the security measures that we have put in place to protect Personal Data about you, we cannot guarantee that loss, misuse, or alteration of data will never occur.

## 6. Personal Data about other individuals

If (i) you provide us with Personal Data about your representatives and/or any other individuals and/or (ii) such Personal Data are transferred to or by you outside the EEA in a country not recognised as providing an adequate level of protection, you undertake and warrant that you have informed such individuals about the processing, use and transfer of their Personal Data by us for the purposes and in the manner described in this Privacy Policy, about their right as described in Section 10 below in accordance with Data Protection Laws, as well as to obtain their explicit consent, where necessary, to the processing and transfer of their Personal Data as set out in this Privacy Policy.

## 7. Links to other websites

Our Website may provide links to other websites for your convenience and information. These websites operate independently from us. As outlined in the [Terms of Use](#) of this Website, we are not responsible for any use of these websites nor for any data processing and privacy practices associated with such websites. We invite you to review these websites' privacy notices if you visit them or provide any Personal Data to them.

## 8. How we may update this Privacy Policy

Except to the extent limited by applicable law, EMVO reserves the right, in its sole discretion, to change, modify, and/or add all or parts of this Privacy Policy, at any time. Any change to this Privacy Policy will be posted on this page and notified to you by e-mail (where appropriate or required by law and to the extent

that we have your e-mail address). We shall indicate in the footer of the Privacy Policy the date when it was most recently updated.

## 9. How long we may keep Personal Data

Personal Data about you will not be kept for longer than necessary for the purposes identified herein, generally for up to ten (10) years unless shorter or longer retention periods apply as per applicable statutory obligations.

Your Personal Data relating to a specific job application procedure in which you participated via the "Career" section of the Website will be kept for as long as we may be held liable as a result of such selection procedure, in accordance with applicable law.

## 10. What are your rights

You, as individual whose Personal Data is processed as described in this Privacy Policy, have a number of rights which are summarized in broad terms as laid down in the following list. Please note that exercising these rights is subject to certain requirements and conditions as set forth in applicable law.

If you wish to access Personal Data about you or exercise any of the rights listed below, you should apply in writing to the contact details identified in Section 11 below.

### 10.1. Right to withdraw consent

If you have declared your consent for any Personal Data processing activities as described in this Privacy Policy, you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to withdrawal of the consent.

### 10.2. Right of access

You have the right to obtain confirmation from us as to whether or not your Personal Data is processed, and, where that is the case, to request access to that Personal Data including, without limitation, the categories of Personal Data concerned, the purposes of the processing and the recipients or categories of recipients. We do have to take into account the rights and freedoms of others, so this is not an absolute right. If you want to request more than one copy of the Personal Data, we may charge a reasonable fee based on administrative costs.

### 10.3. Right to rectification

You have the right to obtain from us the rectification or completion of inaccurate or incomplete Personal Data concerning you.

### 10.4. Right to erasure ('right to be forgotten')

You have the right to obtain from us the erasure of Personal Data concerning you in certain circumstances as defined under applicable law.

### 10.5. Right to restriction of processing

In certain circumstances as defined under applicable law, you have the right to request that we restrict processing of Personal Data about you.

### 10.6. Right to data portability



In certain circumstances as defined under applicable law, you have the right to receive Personal Data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit that Personal Data to another controller.

### 10.7. Right to object

In certain circumstances as defined under applicable law, you have the right to object, on grounds relating to your particular situation, at any time to the processing of Personal Data about you by us and we can be requested to no longer process Personal Data about you.

When your Personal Data is processed for direct marketing purposes, you have the right to object at any time to the processing of your Personal Data for such direct marketing purposes (including profiling insofar as it relates to such direct marketing).

## 11. How to contact us

If you have any questions or concerns about this Privacy Policy, or if you wish to access Personal Data about you or exercise any of the rights listed in Section 10 above, please send a written request at EMVO asbl, Rue du Commerce 123, 1000 Brussels, Belgium, by phone +32 2 657 00 08 or by e-mail to [helpdesk@emvo-medicines.eu](mailto:helpdesk@emvo-medicines.eu).

You must provide evidence of your identity in order to exercise any of the rights listed in Section 10 above.

Any communication from us in relation to your rights as detailed in Section 10 above will be provided free of charge. However, in case of requests that are manifestly unfounded or excessive, in particular because of their repetitive character, EMVO may charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the requested action; or refuse to act on the request.

We invite you to report any complaints about processing of your Personal Data to EMVO in its capacity as data controller. EMVO will investigate and attempt to resolve the complaint. You also have the right to lodge such complaints with the competent authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the GDPR.

————— **END OF DOCUMENT** —————