



The European Molecular Genetics Quality Network



UKAS Accredited
EQA scheme provider

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PRIVACY POLICY

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Introduction

At EMQN we are committed to ensuring that your personal information is protected and never misused.

Our privacy policy explains what personal information we collect, why we collect it, how we use it, the control you have over your personal information and the procedures we have in place to protect your personal information. It applies to personal information we collect through our EMQN website, and in person at our EMQN stands and events.

By sharing your personal information with us, and by continuing to use our website, you confirm that you have read and understood the terms of this privacy policy. We take responsibility for the personal information we collect about you, and we aim to be transparent about how we handle it, and give you control over it.

In this privacy policy, when we refer to "EMQN", "us", "we" or "our", we mean EMQN, which provides you with the EMQN website, and stands or events in your country. Information on which personal information is collected about you, [and the contact details for EMQN's Data Protection Officer], are available in the Contacts Us section at the end of this privacy.

If you have any questions, comments or concerns about any aspect of this privacy policy or how EMQN handles your information, please email us at office@emqn.org.

Privacy principles

Privacy policies can be complicated. We have tried to make ours as clear and as accessible as possible. To help, we have also summarised how we handle your personal information at EMQN in our privacy principles below.

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These principles demonstrate our commitment to protecting your privacy and handling your personal information in the right way and as you would expect it to be handled.

At EMQN we:

- Will only ask for or collect the personal information we need to provide and improve the service, products and experiences our customers expect.
- Give you control over the personal information we hold about you to ensure it is accurate and reflects your preferences.
- Make sure your personal information is always secure and protected.
- Are fair and transparent about how we use the personal information we hold.
- Only ever use your personal information for the purpose that you trusted us to use it for.
- Will never sell your personal information and only share it as outlined in our privacy policy or when you ask us to.
- Respect your choices and will inform you if there are important changes that affect your personal information or how we use it.
- Take responsibility for the personal information that we hold about you.

What personal information do we collect?

We are not interested in collecting every personal detail about you. Our main reason for collecting your personal information is to provide and improve the service, products and experiences that you and our customers expect from us.

Personal information is defined slightly differently across the world. To guarantee your privacy and the protection of your information, we define it as any information that could be used to identify you or another individual.

We collect personal information about you in a number of different ways. In this section, we explain the different ways we collect personal information about you and the ways in which that information will be used. For more detail on how we use your personal information, please see the section titled "How do we use your personal information?".

Information you share with us

We collect personal information that you share with us when you contact us or interact with us through our website, email, phone, in person at our stands and events, or otherwise.

For example, you will provide information to us when you contact our Manchester office team, place an order, complete an EQA, complete a feedback survey, competition or questionnaire, update your preferences and account information, and use our website.

Through these interactions you may share with us: your name, address, e-mail address, contact number and payment information. In some circumstances, we will need that information to be able to provide you with a product or service that you have asked for; for example, we need your payment information when you buy an EQA product, and your address to deliver it to you.

When updating your account information, we do not collect any additional personal information. You can also ask us to delete this information at any time by contacting EMQN office team at office@emqn.org.

Information from your online interactions

We collect, and store limited personal information and some anonymous, aggregate statistics from all visitors to our websites, whether you actively provide us with that information or merely browse our website. The information we collect includes the internet protocol (IP) address of the device you are using, the browser software you use, your operating system, the date and time of access, the internet address of the website from which you link through to our website and information on how you use our website.

We use this information so that we can see how well our website is working, how it is used and what users look at most.

We also collect and handle information about how you engage with our promotional campaigns, outside of our own websites (for example, on Google, YouTube and on social media).

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That information is, predominantly, collected through our use of cookies and similar technologies.

Cookies

We use cookies on our website. "Cookies" are small text files that websites save onto your device via your web browser. They've been around since the mid-1990's and are one of the most widely used technologies on the internet.

Cookies themselves do not contain any personal information, and EMQN does not use cookies to collect personal information. Cookies may be used by 3rd party content providers such as newsfeeds. By continuing to use our website, you accept that cookies will be set on your device.

Email Communications

As a user of our EQA products or services, we will send you support communications by e-mail. As long as you are happy for us to do so, we would also like to keep you posted on anything that's happening at EMQN which we think you might like to know about; whether it's our latest EQA product and service announcements, best practice meetings or other upcoming events, we want to make sure you're happy with the communications you receive from us. You can find out how to update or change whether you would like to hear from us, or stop us contacting you, in the section below titled "How can you change the way that we contact you?".

We collect information about how you engage with our e-mails; including whether they are delivered to you, whether you open them, whether you choose to learn more about what's happening at EMQN (for example, by clicking on a link in our e-mail) and if you ask us not to contact you anymore (by clicking on the unsubscribe option included in all our marketing e-mail correspondence).

We use that information by itself and in combination with your customer record (the information you share with us) to make sure that we stop sending you support or marketing communications when you ask us to. We also use it to make our e-mails as interesting as possible by providing you with content and experiences that we think you will be interested in based on how you have engaged with our previous e-mails; you have the right to object to our use of your information for this purpose (see the section below titled "Your controls and choices").

Social Media

You may use social media to contact us about your EMQN products and services, or to let people know what you think about your EMQN products and services. We review publicly available social media and online sites to get a better understanding of what people are saying about us, and our products, technology and services and to assist consumers who prefer to contact us through social media.

The information we collect from social media and online sites, including YouTube, Twitter, and LinkedIn, sometimes includes personal information that has been put online and is publicly available. We make sure any information we use is properly credited to its source or is made anonymous.

These online and social media sites typically have their own privacy policies explaining how they use and share your personal information. You should carefully review those privacy policies before you use these sites to make sure that you are happy with how your personal information is being collected and shared.

Information we collect at trade stands and events

You may share personal information with us when you visit us in person at our trade stands and events; such as your name and contact details (see the section above titled "Information you share with us").

Information we collect from third party data providers

We do not collect/use information from third party data providers.

How do we use your personal information?

Our main reason for collecting and using your personal information is to provide and improve the services and products that you expect from us.

Information you share with us

We use the personal information you share with us in the following ways:

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- To respond to your queries and requests;
- To communicate with you;
- To provide services and support for our EMQN products and services;
- For customer satisfaction surveys to enable us to identify where service and product improvements can be made and to allow us to improve your experience should you need support from one of our experts;
- To provide updates to you about any changes to EMQN's policies, terms and conditions and any other matters which we may need to tell you;
- As long as you are happy for us to do so, to tell you about our other products and services; and
- To provide you with essential service updates about your EMQN products and services.
- If you provide specific consent, we will also use the data you provide to send you information related to:
- EMQN meetings or EMQN events or stands at meetings which are not directly related to EQA scheme participation.
- Meetings or other activities from third parties approved by EMQN.

Information from EMQN products and services

We use the personal information we collect from EMQN products and services, by itself and in combination with other personal information that we collect about you, in the following ways:

- To monitor the performance and stability of our products so that we can optimise their performance; in particular, we want to be able to identify when there may be an issue with an EMQN products or services so that we can let you know about it as soon as possible (and potentially before the issue actually arises);
- To improve our products, and services generally;

You have the right to object to our monitoring of your use of EMQN products and services for these purposes. For more information on how to exercise your right to object, see the section below titled "Your controls and choices".

Information from your online interactions

We do monitor your use of our website using cookies, but we only collect anonymised data and statistics on usage (for example on browser type, pages accessed, geographic region of user etc).

Other potential uses of your personal information

We use your personal information:

- To assist in any disputes, claims or investigations relating to your EMQN products or services;
- To detect and prevent fraudulent activity and collusion; and
- To comply with our legal obligations. For more information on how to exercise your right to object, see the section below titled "Your controls and choices".

What is our justification for handling your personal information in this way?

Data protection and privacy laws in some countries require us to have what's called a "legal basis" or "lawful ground" for handling personal information. Broadly, that means that we have to have a legal justification for handling your personal information. For the most part, we need to handle your personal information to be able to:

- provide you with the EMQN products or services that you have asked for; and
- for our website to be able to work properly and to do all the things that you expect of it.

Sometimes, our use of your personal information is not strictly necessary for us to be able to provide you with our products and services. In those circumstances, we have what's called a "legitimate interest" in handling your personal information; our "legitimate interest" may be to:

- detect and prevent fraudulent activity and collusion;
- keep our websites, and IT systems secure;
- ensure that our own processes, procedures and systems are as efficient as possible;
- analyse and enhance the information that we collect; and
- determine the effectiveness of our promotional activity.

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Finally, in some, relatively limited circumstances we will need to handle your personal information in a certain way to be able to comply with our legal obligations; for example, if we are requested to disclose your personal information to regulatory bodies or law enforcement authorities.

Ultimately, the reason we handle your personal information in the way we do is so that we can directly or indirectly, improve our products, services and your overall experience of EMQN as a business. Whatever our justification for handling your personal information (whether it is necessary for us to provide you with a certain product, or it is in our "legitimate interests"), we make sure that we take steps to honour our commitment to protect your privacy.

EMQN contact promise

We love to keep you posted, whether it's on our latest EMQN product or service announcements, new best practice meetings, or upcoming events.

We do this in various ways, including on our website, via e-mail and social media platforms, but only if you are happy for us to do so. Ultimately, we want to make sure you're happy with the communications you receive from us.

We therefore promise to:

- Only send you marketing communications when you have told us it is ok to do so;
- Never pass your personal information to anyone outside of EMQN for them to use for their own marketing purposes; and
- Give you the option to stop receiving support or marketing communications at any time.

How can you change the way that we contact you about our products, services and support?

We will only send you marketing communications when you have told us that you are happy for us to do so. You can change the way that we contact you in the following ways:

Opt-In/Start Contacting Me

If you hadn't previously asked us to send you marketing communications, you can ask us to start contacting you (sometimes called an "opt-in") by:

- Contacting the EMQN office team (office@emqn.org) and stating that you would like to receive communications from us, or
- Logging onto your account on our website and changing your preferences and information.

Changing your preferences

If you have previously said that you would like us to contact you ("opted-in") but would like to change or update the way that we do so, you can update your preferences by:

- Contacting the EMQN office team (office@emqn.org) and stating that you would like to change or update the way that we contact you; or
- Logging onto your account on our website and changing your preferences and information.

Opt-Out/Stop Contacting Me

If you want to stop receiving marketing or support communications from us (sometimes called "opting out"), you can do so at any time by:

- Contacting the EMQN office team (office@emqn.org) stating that you no longer wish to receive such communications;
- Using the unsubscribe option included in most of our e-mail correspondence (on all marketing and support communications), or
- Logging into your account on our website and changing your preferences and information.
- Emailing our EMQN office team at office@emqn.org.

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What personal information does EMQN share with third parties?

We never sell your personal information to anyone and only share it as outlined in this privacy policy or when you ask us to.

Third party service providers

We share your personal information with certain third-party service providers. They only have access to the personal information they need to perform those services. They are required to keep your personal information confidential and may not use it other than as we ask them to and always in accordance with this privacy policy. Those third-party service providers fall into the following categories:

- Certain distributors, who help us to sell our products in certain countries;
- Those helping us to deliver products and services to you, for example other EQA providers such as GenQA, RCPAQAP and CSCQ; and
- Third parties that help us with mailing services, financial services, audit services, administrative services, IT technologies (e.g. data storage).

Third parties that help us with our advertising and marketing

We want to make sure that our advertising and marketing is relevant and interesting to you and our other customers. That means that we work with third parties to help us to understand how well our online advertising works, or to reach people who are more interested in EMQN products and services. They do this by setting cookies on our website (more information on this can be found in the section "Cookies").

We will also share limited personal information with:

- third party data providers and analytics companies (for example Mailchimp and Google Analytics), who perform data matching and/or data analysis on our behalf.

Other third parties

We do not share personal information with other third parties unless required to do so by law, including in response to a legal process, such as a court order, or to comply with other national, state, provincial or local laws.

If you would like more information on how we share your personal information, please email the EMQN office team at office@emqn.org.

Links to third party websites

We provide links to other websites which are not operated and controlled by EMQN. We have no control over and are not responsible for the content of those sites or how the third parties responsible for them collect and use your personal information. We do not endorse or make any representations about third party websites.

Third party websites usually have their own privacy policies explaining how they use and share your personal information. You should carefully review those privacy policies before you use these websites to make sure that you are happy with how your personal information is being collected and shared.

How long do we keep your personal information?

We only keep your personal information for as long as we need to, to be able to use it for the reasons given in this privacy policy, and for as long as we are required to keep it by law. The actual period for which we store your personal information will vary depending on the type of personal information and how it is used. For example;

- If you stop being a named contact for an existing EQA participant, we will hold your details for a maximum of 5 years after you stop being a named contact.
- If your laboratory stops participating in our EQA schemes while you are a named contact for the laboratory, we will hold your personal information for a maximum of 5 years after the last participating scheme year. After 5 years we will remove personal names and email addresses from

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the information for previous EQA participants. However, we will store the participation and performance data related to previous EQA participants for 10 years after the last participating scheme year.

- If you have consented to us contacting you for purposes other than those related to EQA scheme participation we will keep your data until you tell us that you wish to be removed from the relevant contact list or for a maximum of 5 years after you last gave your consent to be contacted.
- If we are storing your information for purposes other than those related to EQA scheme participation and you wish to have your personal information removed from our records, please contact the EMQN Office team (office@emqn.org).

Your controls and choices

Where possible, we give you control over the personal information we collect about you, to ensure it is accurate and reflects your preferences. You have the right to access, update and amend personal information that we hold about you; you can do that in relation to some of your personal information in your account. If you would like to change the way that we contact you, see the section above titled "How can you change the way that we contact you about our products, services and support?".

In certain circumstances, you can also:

- Object to our use of your personal information for certain purposes;
- Ask us to limit or restrict our use of your personal information;
- Ask us to correct, remove or delete personal information about you; or
- Ask us to provide your personal information to a third-party provider of services.

Please note that those rights do not always apply and there are certain exceptions to them. We will also need to confirm identity before acting on certain requests.

If the law in your country allows us to impose a fee for giving you access to your personal information, or to exercise any of your other rights in relation to your personal information, we will let you know. If you would like to exercise any of your rights in relation to your personal information, then please email the EMQN office team office@emqn.org.

How do we protect your personal information?

We are committed to protecting your personal information. We use appropriate technical and organisational measures, including encryption, to protect your personal information and privacy, and review those regularly. We protect your personal information using a combination of physical and IT security controls, including access controls that restrict and manage the way in which your personal information and data is processed, managed and handled. We also ensure that our staff are adequately trained in protecting your personal information. Our procedures mean that we may occasionally request proof of identity before we share your personal information with you.

In the unlikely event that we do suffer a security breach which compromises our protection of your personal information and we need to let you know about it, we will do so.

Data transfers, storage and the global handling of your personal information

EMQN will collect personal information from you in the country in which you live. We then host, store and otherwise handle that information in the UK (at our headquarters). If we are required to share information outside of the UK, then we will make sure that any transfers of your personal information from one country to another comply with those data protection and privacy laws which apply to us. European data protection laws, in particular, include specific rules on transferring personal information outside the EEA.

When transferring personal information outside the EEA, we will:

- include standard data protection clauses approved by the European Commission for transferring personal information outside the EEA into our contracts with those third parties (these are the clauses approved under [Article 46.2 of the General Data Protection Regulation \(GDPR\)](#)); or

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- ensure that the country in which your personal information will be handled has been deemed "adequate" by the European Commission under [Article 45 of the GDPR](#); or
- ensure that we have either a contractual agreement, or data transfer agreement is in place.

In any case, our transfer, storage and handling of your personal information will continue to be governed by this privacy policy. If you would like further information about the global handling of your personal information, please contact the EMQN office team at office@emqn.org.

You can find out further information about the rules on data transfers outside the EEA, including the mechanisms that we rely upon, on the European Commission website [here](#).

Children

EMQN's website, products and services are not designed for, or intentionally targeted at, children. We do not knowingly collect any personal information from children.

If you are a child, please do not attempt to become a registered user of our EMQN or otherwise provide us with any personal information. If we learn that we have inadvertently obtained personal information from a child, we will delete that information as soon as possible.

If you are aware of a child who has provided their personal information to us, please contact the EMQN office team at office@emqn.org.

Changes to this privacy policy

We will review and update this privacy policy at least once a year and will note the date it was last updated below.

If we change our privacy policy, we will post the details of the changes below. If we have your e-mail address, we may also e-mail you with information on those changes. If we need to, we will also ask you to confirm that you are happy with those changes.

This privacy policy was last reviewed and updated in December 2018.

Previous changes to this privacy policy

Version	Date	Change
1	December 2018	We published our Global Privacy Policy to comply with the requirements of new European data protection laws (specifically, the General Data Protection Regulation).

Contact us

If you have any questions, comments or concerns, or would like to make a complaint about how we use the personal information we hold about you, please email , or write to, our EMQN Office Team, or contact the EMQN Data Protection Officer (office@emqn.org).

You can also contact the relevant regulator or authority in your country that is responsible for handling complaints about the use of personal information. The regulator in the United Kingdom is:

The Information Commissioner's Office, Water Lane, Wycliffe House, Wilmslow - Cheshire SK9 5AF

Tel: +44 1625 545 745

Email: casework@ico.org.uk; international.team@ico.org.uk

Website: ico.org.uk

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You can contact our EMQN office team by email at office@emqn.org or in writing at EMQN Office, C/O Manchester Centre for Genomic Medicine, 6TH Floor, St Mary's Hospital, Hathersage Road, Manchester M13 9WL. We will get back to you as soon as possible.

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