

## **PRIVACY POLICY**

In this document, the Psychology Health Institute of The Polish Psychologists' Association as the Personal Data Administrator (ADO) presents how it implements the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing personal data and their free movement.

Personal data is any information relating to an identified or identifiable individual. When collecting and using personal data, we are transparent about the basis and method of processing personal data.

## **SECURITY**

We have implemented measures to protect your personal data from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. All collected data are protected using appropriate technical and organizational measures and security procedures. We implement our internal rules, procedures and trainings covering data protection, data security and confidentiality.

## **PERSONAL DATA ADMINISTRATOR**

Psychology Health Institute of The Polish Psychologists' Association

ul. Gęślarska 3,

02-412 Warsaw

You can contact PDA in the following way:

- by post to the following address: Psychology Health Institute of The Polish Psychologists' Association

Gęślarska 3, 02-412 Warsaw

- by e-mail: [poczta@ipz.edu.pl](mailto:poczta@ipz.edu.pl)

- by phone: (22) / 863 87 38, fax (22) / 863 42 75

## **DATA PROTECTION OFFICER (DPO)**

In order to ensure data security was appointed the Data Protection Officer, Katarzyna Mączyńska, which you can contact by e-mail: [inspektor@mbrk.pl](mailto:inspektor@mbrk.pl).

## **DATA TYPE AND CATEGORIES**

Depending on the purpose and legal basis of the processing, the Psychology Health Institute of The Polish Psychologists' Association may collect and process, among others the following data:

1. identification data such as: name, surname, PESEL number, date of birth, company name, NIP, REGON, business address, bank account number;
2. contact details such as: correspondence address, home address, telephone number, e-mail address;
3. data collected during the recruitment procedure: education, previous employment history, skills, references, image, other information.

## **PURPOSE, LEGAL BASIS AND PERIOD OF DATA PROCESSING**

Regarding the provided medical services

Personal data processed for the purposes of registration, communication, provision of health services and keeping medical records are processed on the basis of Article 6 (1) c) GDPR - legal obligation and Article 9 (2) h) of the GDPR in connection with Article 3 (1 and 2) of the Act on medical activity and Article 24 of the Act on the rights of the patient and the Patient Ombudsman.

Where third parties are authorized to provide information on the patient's health status and medical records, the legal basis for data processing is Article 6 (1) l and c) GDPR in connection with Article 9 (3) of the Act on Patient Rights and the Patient's Rights Ombudsman and Article 6 (1) l and c) GDPR in connection with Article 26 (1 and 2) and Article 27 of the Act on Patient Rights and the Patient's Rights Ombudsman and in § 70 and § 71 of the Regulation of the Minister of Health of April 6, 2020 on the types, scope and patterns of medical documentation and the method of its processing.

Data processing in connection with the establishment, pursuit of claims and defense against claims is based on the legitimate interest of the Data Administrator (Article 6 (1) (f) of the GDPR).

Personal data, in order to fulfill obligations resulting from legal provisions, will be processed for the period of fulfillment of these obligations and required by law, and if they constitute medical documentation - for 20 years from the end of the calendar year in which the last entry was made, subject to the exceptions set out in Article 29 of the Act on the rights of patients and the Patient Ombudsman.

### **Regarding contact via the contact form**

Personal data for the purpose of communication via the contact form will be processed on the basis of Article 6 (1) (f) GDPR (legitimate interest) for the period of maintaining current relations or until effective objection to data processing is submitted.

### **Regarding the subscription to the newsletter**

Personal data for the purpose of subscribing to the newsletter with notifications about our trainings and publications, will be processed on the basis of Article 6 (1) f) GDPR, i.e. legitimate interest and Article 10 of the Act of 18 July 2002 on the provision of electronic services, until the consent is withdrawn or an objection is raised, whichever occurs first.

### **Regarding the Professional School of Psychotherapy**

Personal data for the purpose of recruitment to the Professional School of Psychotherapy, student records, communication and issuing diplomas and relevant certificates of completion of postgraduate training, are processed on the basis of Article 6 (1) b) GDPR - taking action at the request of the data subject before concluding the contract and the necessity for the performance of the contract and the legitimate interest of the Institute - Article 6 (1) (f) GDPR.

If the application for admission to the Professional School of Psychotherapy is rejected, the application will be destroyed immediately after the recruitment is completed. In the event of admission to the School, the Institute will store the personal data of students until the goal of graduating from the Professional School of Psychotherapy is achieved, prior to the prior submission of objections or the prescription of possible claims.

### **Regarding the Training and Psychoeducation Center**

Personal data for the purposes of recording and participating in training courses, communication and issuing certificates and relevant certificates of completion of training, are processed on the basis of Article 6 (1) b) GDPR - taking action at the request of the data subject before concluding the contract and the necessity for the performance of the contract and the legitimate interest of the Institute - Article 6 (1) (f) GDPR.

Personal data of training participants will be processed until the purpose of conducting the training is achieved, prior to the prior submission of objections or the prescription of possible claims.

### **Regarding the clinical internship at the Psychology Health Institute of The Polish Psychologists' Association**

Recruitment for the internship, its implementation and the issuance of relevant certificates are processed on the basis of taking steps at the request of the data subject before concluding the contract and the necessity for the performance of the contract - Article 6 (1) b) GDPR and on the basis of a legitimate interest - Article 6 (1) f) GDPR.

If the application for admission to the internship is rejected, the application will be destroyed immediately after the recruitment is completed.

In the event of admission to an internship, the Institute will store personal data for the period required by the relevant provisions of law in the scope of storing documentation related to the internship.

### **Regarding participation in organized competitions**

In order to conduct competitions, personal data is processed on the basis of Article 6 (1) a) of the GDPR - consent. Personal data of competition participants will be stored until the consent to the processing of personal data for competition purposes is withdrawn, the competition ends or any claims are time-barred.

### **Regarding Clients of Wydawnictwo Zielone Drzewo, purchase of publications or subscription to magazines**

Personal data in order to conclude and perform the contract will be processed on the basis of Article 6 (1) b) GDPR for the duration of the contract and until the deadlines for pursuing claims. In order to deal with complaints, complaints or returns, personal data will be processed on the basis of Article 6 (1) c) GDPR for 1 year after the expiry of the warranty or settlement of the complaint or return. Personal data for the purpose of archiving settlement documents will be processed on the basis of Article 6 (1) c) GDPR until the expiry of the limitation period for the tax obligation.

**Regarding business contacts** Personal data in connection with the conclusion and performance of the contract are processed on the basis of Article 6 (1) b) GDPR - performance of the contract, and in terms of communication with contact persons based on Article 6 (1) f) GDPR - legitimate interest.

Personal data will be stored for the duration of the cooperation agreement, and after that time for the period of limitation of possible claims and the period of storage of accounting and tax documentation resulting from legal provisions.

### **Regarding correspondence with the Psychology Health Institute of The Polish Psychologists' Association**

Electronic and traditional correspondence is conducted on the basis of Article 6 (1) f) GDPR - legitimate interest. In this respect, retention periods appropriate for a given set and process of personal data processing apply.

### **Regarding the provision of financial support to the Psychology Health Institute of The Polish Psychologists' Association**

Personal data will be processed for the purpose of keeping accounting books and tax documentation, pursuant to Article 6 (1) c) GDPR in connection with Article 74 (2) of the Accounting Act of September 29, 1994 and in connection with Article 26 (7) of the Act of July 26, 1991 on personal income tax. In the event of performance of the contract / donation, personal

data will be processed on the basis of Article 6 (1) (b) of the GDPR. The data will be stored for the period of storage of accounting and tax documentation resulting from legal provisions.

### **Regarding candidates participating in the recruitment process at the Institute of Health Psychology of the Polish Psychiatric Association**

Personal data for the purpose of recruitment for a given position are processed on the basis of Article 6 (1) c) GDPR - legal obligation, Article 6 (1) b) GDPR - taking steps at the request of the data subject before concluding the contract and Article 6 (1) f) GDPR - legitimate interest.

Personal data of job candidates will be stored until the recruitment process for a given position is completed.

### **PERSONAL DATA RECIPIENTS**

Your personal data may be accessed by:

1. employees and associates of the Psychology Health Institute of The Polish Psychologists' Association as authorized to process personal data;
2. entities entrusted with the processing of personal data by the Psychology Health Institute of The Polish Psychologists' Association;
3. entities operating postal or courier;
4. entities and law offices supporting the process of pursuing claims and defense against claims;
5. in the case of personal data processed for the purpose of providing health services - other medical entities to ensure the continuity of treatment and the availability of health services;
6. other entities, persons or bodies - to the extent and on the terms specified by law, including persons authorized by you as part of the implementation of patient rights.

### **RIGHTS IN CONNECTION WITH THE PROCESSING OF PERSONAL DATA**

In connection with the processing of personal data by the Psychology Health Institute of The Polish Psychologists' Association, you are entitled to:

1. right to access your personal data (Article 15 of the GDPR);
2. right to rectify your personal data (Article 16 of the GDPR);
3. right to request the deletion of data in the cases specified in Article 17 (1), taking into account the exceptions specified in Article 17 (3) GDPR;
4. right to request restriction of data processing in the cases specified in Article 18 GDPR;
5. right to object to data processed on the basis of a legitimate interest with appropriate data processing deadlines (Article 21 of the GDPR);
6. right to transfer data in the cases specified in the provisions of Article 20 GDPR;

7. right to withdraw consent to the processing of data by the Administrator at any time, without affecting the lawfulness of the processing, which was made on the basis of consent before its withdrawal (in cases where the basis for data processing was the consent);

8. right to lodge a complaint to the supervisory body (the President of the Personal Data Protection Office, ul. Stawki 2, 00-193 Warsaw), if it is found that the processing of your personal data violates the provisions of the GDPR.

The above rights indicated in point 3, 4 and 5 do not apply to personal data collected in medical records.

Your personal data will not be subject to profiling resulting in decisions based solely on automated processing (without the participation of staff), causing legal effects on you or similarly significantly affecting them.