

Registry Record Retention Schedule

EMSO ERIC

(Article 30 c. 1 and 2 EU Regulation 2016/679 GDPR)

Summary description of the treatment “Description of the relevant activity / work package”

Category of Data	Common personal data (personal data, C.F., telephone numbers, e-mail, residence) expression of opinion
Data handling	Data processing is carried out through automated tools (e.g. using electronic procedures and media) and/or manually (e.g. on paper) for the time strictly necessary to achieve the purposes for which the Data has been collected so as to offer the experience of navigation to interested parties and allow them to use the services requested by them and in any case in accordance with current regulations on the subject. The Data Controller has adopted appropriate technical and organizational measures to ensure a level of security appropriate to the risk in accordance with art. 32 of the GDPR, so as to prevent the loss of data, illicit or incorrect use and unauthorized access.
Data Access	The Company declares and guarantees that it will in no way make an instrumental or commercial use of your Personal Data. Furthermore, Personal Data will not be transferred or shared with third parties, except with other companies of the Emso Eric - in full compliance with the relevant Binding Corporate Rules - and with the categories of subjects listed below, always and only for the purposes listed above (the "Third Parties"): the employees of the Company, whose duties include carrying out the processing activities set out above. For completeness of information, the expression "employees of the Company" also includes employees of other companies of the Emso Eric; natural persons and entities, including those without legal personality, who sell goods and / or provide services to the Company (the "Suppliers"); in particular, the Providers of information technology solutions and cloud storage and repository services, the builders of the databases made available to the Company under license;



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	<p>any other third party legitimately transferee, in whole or in part, of the rights and / or obligations of the Company;</p> <p>consultants and professionals, external to the Company, as well as professional associations and companies between professionals whose services the Company uses, also for operations on the Company's assets and for the so-called extraordinary corporate transactions;</p> <p>the commercial partners of the Company, who compete with the Company in providing information, within the limits permitted by law and by the regulations of the pharmaceutical sector, about the Company's products and services.</p> <p>The aforementioned Third Parties are in any case obliged, by virtue of a specific contract, to guarantee a level of protection and confidentiality of Personal Data such as to comply with any regulatory obligation regarding the processing and security of information, including the obligations and duties deriving from Privacy Policy.</p> <p>Access to personal data will be granted only to employees specifically "in charge" and authorized, who have an actual need to use such data and who have been instructed to carry out the processing in a suitable manner, in compliance with the principles of security and confidentiality and with obligations of secrecy and professional confidentiality. Any violations of the law on the protection and processing of personal data by employees of the Company will be assessed internally, including disciplinary. Compliance by staff with the relevant codes of conduct and other business procedures shall be subject to regular monitoring and verification.</p>
Storage	<p>according to relevant internal Emso Eric privacy policies (i.e., Privacy notices for staff, etc.)</p>
Records	<p>Records can be defined as ‘Information created, received and maintained as evidence and information by an organisation or person in pursuance of legal obligations or in the transaction of business’.</p> <p>Records are an essential resource and contain information which is unique and invaluable. They can be used as an audit trail as they provide evidence/proof of a specific activity. Records come in electronic (including emails, video and audio materials) and paper format. It is important that both types must be managed equally well, especially in terms of storage, accessibility and disposal.</p> <p>Records should be managed accordance with the principles below:</p> <p>Records => Records are evidence of our actions and decisions and must be retained as long as required</p> <p>Responsibility => All staff have responsibility for Records and should be aware of what they are using and creating and how they should be retained;</p> <p>Risk => There are significant risks from loss, damage or unauthorised access which need to be managed effectively. There are also risks from loss of control of records;</p> <p>Retention => Keep records only as long as they are needed;</p> <p>Rights => The public has a right to access our records subject to data protections regulations and Freedom of Information exemptions;</p>



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	Reliability => Records should be managed effectively to ensure that they are high quality and reliable.
Sharing of Data	No particular category of your Personal Data (c.d. «sensitive data»: for example, information on health status) will be processed and/or communicated to third parties, internal or external to the Emso Eric, except in the presence of prior and explicit written consent, which, however, must be lent to the Society in a specific and timely manner. Also in this case, the processing will take place for the purposes mentioned above
Retention of Data	The purposes of Retention Schedule are to:
	<ul style="list-style-type: none"> • Improve efficiency of working practices and enable easy and speedy retrieval of records;
	<ul style="list-style-type: none"> • Prevent records from being discarded prematurely;
	<ul style="list-style-type: none"> • Ensure that information is not kept unnecessarily;
	<ul style="list-style-type: none"> • Eliminate retention of duplication of records;
	<ul style="list-style-type: none"> • Provide a consistent, controlled system for the disposal of material across EMSO;
	<ul style="list-style-type: none"> • Help in saving space, time, effort and money;
	<ul style="list-style-type: none"> • Comply more readily with requests for information, both internally and externally
	A properly implemented and consistently applied Records Retention Schedule improves the efficiency of working practices, and protects the interests of EMSO by ensuring that records are not kept for longer than they are needed to meet operational needs.
	EMSO does not keep all records permanently. Only records which have, evidential, legal, historical, or business importance are retained for a specific length of time or permanently (in limited cases).
	Emso Eric, as Data Controller, keeps in its systems the Data acquired in form that allows the identification of the interested parties for a period of time strictly necessary for the pursuit of the purposes for which they are processed and in any case for a maximum of 5 years from the end of the project.
Staff Responsibilities	Heads of EMSO's Departments have overall responsibility for the management of records generated by activities within their departments.
	The Head of HR has particular responsibility to ensure the integrity of the staff and staff records respectively and is responsible for managing staff records while the Head of Admissions is responsible for applicant data.
	All staff have record management responsibilities. Each member of staff is responsible for ensuring that records within their control are not kept permanently, unless they fall within the various categories listed in the Retention Schedule and need to be retained for archival purposes.
	All staff should be aware that they are creating records through their work and ensure that these are secured and disposed of appropriately, including emails. They should establish which emails are key records and act accordingly.



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<p>Format of Retention Schedule</p>	<p>The Retention Schedule which forms part of this Policy has been prepared to assist in the effective management of records by identifying types of documents held by each Departments which require retention, setting out the retention period for each type of document, who is responsible and the reasons for keeping it.</p> <p>The retention periods are independent of format and therefore apply to any medium whether paper or electronic records.</p> <p>There is an “Owner of Records” category which identifies the head of each Department or Support Service who has overall responsibility for the management and disposal of the record. The Owner of the Record is responsible for the implementation of the Retention Policy within their area of responsibility must ensure that records are managed in accordance with the schedule and disposed of when required on an annual basis.</p>
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