

Net4Doctor Privacy Policy

This policy explains what personal data we collect on the Net4Doctor platform, why, on what legal basis, how long we keep it and what your rights are. We have tried to keep it plain – if anything is unclear, write to us at admin@n4d.pl.

1. Who is responsible for your data

The controller of your personal data is **Net4Doctor sp. z o.o.**, ul. Gdańska 126/128, 90-520 Łódź, Poland, registered in the Polish National Court Register (KRS) under no. 0000346120, tax ID (NIP) 7282740006, REGON 100820817 ("Net4Doctor", "we").

Data protection contact:

- email: admin@n4d.pl,
- by post: Net4Doctor sp. z o.o., ul. Gdańska 126/128, 90-520 Łódź, Poland.

This policy covers net4doctor.pl and its subpages, event and webinar pages, the live-streaming platform and on-demand (VOD) recordings available in the Net4Doctor environment (the "Platform").

2. What data we collect

Platform account: first and last name, email address, password (stored in encrypted form only), medical licence number, town, date of birth and phone number.

Registration for an event or webinar: first and last name, email address, country, medical licence number or local healthcare professional (HCP) ID, declaration of HCP status, the events you choose and the consents you give. The exact data for each event may differ – you always see it in the form.

Taking part in live streams and recordings: time you join and leave the stream, total viewing time, VOD recordings watched, questions and messages sent in the chat, survey answers.

Using the Platform: IP address, device, operating system and browser type, time zone, pages visited, date and time of visits, data from cookies and similar technologies (see section 8).

Contacting us: the data you provide in your message or call. Phone calls with our staff may be recorded – we tell you at the start of the call.

We do not ask for health data. Please do not enter information that could identify patients in the chat or in surveys.

3. Purposes, legal bases and retention

- **Creating and running your account, access to educational content.** Legal basis: Art. 6(1)(b) GDPR (contract for electronic services). Retention: until the account is deleted, then until the limitation period for claims expires.
- **Confirming that you use the content as a healthcare professional.** Legal basis: Art. 6(1)(b) and (f) GDPR (our legitimate interest in making HCP-only content available to HCPs only). Retention: for as long as the account or event registration exists.

- **Event registration and participation; confirmations, reminders and access to recordings.** Legal basis: Art. 6(1)(b) GDPR. Retention: for the event and the recording access period (usually up to 12 months), then until the limitation period for claims expires.
- **Attendance reports for the event organiser or partner.** Legal basis: consent (Art. 6(1)(a) GDPR) or legitimate interest (Art. 6(1)(f) GDPR), as stated when you register for the event. Retention: as stated for the event, no longer than the end of the recording access period.
- **Chat moderation and Q&A during events.** Legal basis: Art. 6(1)(f) GDPR (running the event smoothly). Retention: until the event ends and its report is complete.
- **Post-event surveys.** Legal basis: Art. 6(1)(f) GDPR (assessing and improving quality). Retention: until results are compiled, no longer than 12 months; aggregated results are anonymous.
- **Net4Doctor's own marketing (newsletter, information about courses and events by email or phone).** Legal basis: Art. 6(1)(a) GDPR – your consent, also required by the Polish Electronic Communications Law. Retention: until you withdraw consent.
- **Sharing data with a partner for that partner's marketing.** Legal basis: Art. 6(1)(a) GDPR – separate consent naming the partner. Retention: until you withdraw consent.
- **Analytics, security and development of the Platform.** Legal basis: Art. 6(1)(f) GDPR; for non-essential cookies – consent (Art. 6(1)(a) GDPR). Retention: up to 14 months.
- **Handling enquiries and complaints.** Legal basis: Art. 6(1)(f) GDPR. Retention: until the matter is closed, then until the limitation period for claims expires.
- **Call recording for training and quality control.** Legal basis: Art. 6(1)(f) GDPR. Retention: up to 90 days.
- **Invoicing, accounting and tax.** Legal basis: Art. 6(1)(c) GDPR (obligations under accounting and tax law). Retention: for the period required by law, usually 5 years from the end of the year.
- **Establishing, pursuing and defending legal claims.** Legal basis: Art. 6(1)(f) GDPR. Retention: until the limitation period expires.

When these periods end, we delete or anonymise the data.

4. Events and webinars with partners

Some events are run for or together with partners, such as pharmaceutical companies, scientific societies or medical centres. When you register for such an event, we always tell you:

- who organises the event,
- who the controller of your data is for that event,
- what data we share with the partner (e.g. name, email, country, HCP ID, live viewing time and recordings watched),
- for what purpose and on what legal basis (e.g. an attendance report),
- how to withdraw consent, where sharing is based on consent.

A partner that receives data as an independent controller processes it under its own privacy policy. Where the partner is the controller for an event, Net4Doctor processes the data only on the partner's behalf, under a data processing agreement.

Live streams may be recorded and made available on demand. Attendees are not shown on screen. Questions sent in the chat may be visible to other attendees and passed to the speakers.

5. Who we share data with

We share data only where needed for the purposes above:

- IT, hosting, email and message delivery providers,
- video streaming platform and analytics providers,
- our accountants, law firms and advisers,
- event partners and organisers – as described in section 4,
- public authorities, where required by law.

Providers acting on our behalf process data only on our instructions, under a data processing agreement. We do not sell personal data.

6. Transfers outside the European Economic Area

Some of our providers, in particular video platform and analytics providers, may process data outside the EEA, including in the USA. Such transfers rely on a European Commission adequacy decision (e.g. the EU-US Data Privacy Framework, where the recipient is certified) or on the Commission's standard contractual clauses. You can ask us about the safeguards in place.

7. Your rights

You have the right to:

- **access** your data and receive a copy,
- **rectify** inaccurate or incomplete data,
- **erase** your data ("right to be forgotten"),
- **restrict** processing,
- **data portability** for data processed under a contract or consent,
- **withdraw consent** at any time – this does not affect processing carried out before withdrawal,
- **lodge a complaint** with the President of the Personal Data Protection Office (UODO), ul. Stawki 2, 00-193 Warsaw, Poland, or with the supervisory authority in the EU country where you live or work.

Right to object. You may object at any time, on grounds relating to your particular situation, to processing based on our legitimate interest. We will always stop processing for direct marketing if you object – no reason needed.

To exercise your rights, email admin@n4d.pl. We reply without undue delay and within one month at the latest. For complex requests this may be extended by two further months – we will let you know. You can also update some data yourself in your account settings or via the personal link you receive after registering for an event.

8. Cookies and analytics

We use cookies and similar technologies. Essential cookies keep the Platform, log-in and live streams working. Analytics and marketing cookies are set only if you consent in the cookie banner. You can change your choice at any time in the cookie settings, which also list the tools we use and how long cookies are kept.

9. Do you have to provide your data

Providing data is voluntary. However, without the data marked as required we cannot create an account, register you for an event or give you access to content intended only for healthcare professionals. Marketing consents are never a condition of using the Platform.

10. Automated decisions and profiling

We do not make decisions based solely on automated processing that produce legal effects for you or similarly significantly affect you.

11. How we protect your data

We use technical and organisational measures appropriate to the risk, including encrypted connections (TLS), access controls, backups and data processing agreements with our providers. Only authorised staff bound by confidentiality have access to personal data.

12. Social media

We run profiles on Facebook, Instagram, LinkedIn and X. We process the data of people who interact with them (e.g. comment or send messages) to run the profile and communicate – based on our legitimate interest (Art. 6(1)(f) GDPR). For page statistics, we are joint controllers with the platform operator, which also processes data under its own privacy policy.

13. Changes to this policy

We update this policy when our services or the law change. We will announce significant changes on the Platform or by email. The current version, with its effective date, is always available on this page.

If the Polish and English versions differ, the Polish version prevails.