

# Website and Newsletter Privacy Policy

INNODIA's privacy policy contains information about the processing of your personal data (hereon "data") in the context of INNODIA Website and Newsletter.

INNODIA is committed to protecting your privacy. This Privacy Policy outlines the types of personal information INNODIA collects, how it is used, and the steps taken to safeguard your information.

For INNODIA's other data processing activities, we apply a customized privacy policy. Users will receive a dedicated link to access to the relevant policy depending on data treatment. These policies will be stored in a hidden section of the INNODIA website.

## WHAT IS INNODIA?

INNODIA is an international non-profit organization (iVZW). INNODIA is the interface between those who want to develop new disease modifying therapies and those who have the expertise and tools to do so. INNODIA catalyses, in a comprehensive and efficient way, entities that have often different incentives but who want to address the same unmet medical need: the lack of definitive cures for type 1 diabetes.

### Innodia iVZW

Address: Herestraat 49, Onderwijs en Navorsing 1bis, box 902, 3000 Leuven

Email: [privacy@innodia.org](mailto:privacy@innodia.org)

Company Number: BE 0792.991.133

## TYPE OF DATA INNODIA PROCESSES

When we process your data, this concerns the data below:

- If you use this website, various pieces of personal data will be collected.
- Identification, contact, and visitor data (name, e-mail address, date and time of visit, etc.)
- If you choose not to unsubscribe to the INNODIA Newsletter
- Any additional information you share with INNODIA

## COOKIES

This website uses:

- Strictly necessary technical cookies;
- strictly necessary functional cookies;
- a privacy-friendly analysis tool.

Strictly necessary technical cookies are necessary for the website to function correctly, and you cannot refuse them.

Strictly necessary functional cookies are strictly necessary to provide a service you have (explicitly) requested. You cannot refuse these cookies if you want to browse INNODIA website, but they are only placed after a choice has been made regarding the placing of cookies.

INNODIA only uses the data included in its cookie policy for analytics purposes if you have given your consent to the use of its analytics tool.

Read INNODIA [policy on cookies](#).

## HOW INNODIA USES YOUR INFORMATION

INNODIA uses the personal information collected for the purpose of your visit to our website and information to you via our website and (when registering to do so) our newsletter.

Where you have specifically agreed to this, send you marketing communications by email relating to our work which we think may be of interest to you.

## DATA SECURITY

INNODIA takes all appropriate security measures to protect your personal information from unauthorized access, alteration, disclosure, or destruction. These measures include SSL or TSL encryption, access controls, and regular security audits.

## OTHERS WITH WHOM YOUR DATA ARE (CAN BE) SHARED

INNODIA will only share your data to third parties in the following circumstances:

- INNODIA is using a third party purely to process data on our behalf and INNODIA has set a data processing agreement with that third party that fulfills legal obligations in relation to the use of third party data processors (e.g. INNODIA processors who are responsible for ICT infrastructure); or
- INNODIA is required by law to share your data;
- You have provided your explicit consent to INNODIA to share data with a third party.

## DATA RETENTION

INNODIA retains your personal information only for as long as necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

INNODIA takes the principles of data minimisation and removal seriously and has internal policies in place to ensure that only the minimum amount of data for the associated purpose is required; INNODIA deletes, anonymises or pseudonymises that data promptly, once it is no longer needed.

## YOUR RIGHTS

Depending on the processing and the legal basis, there are several possibilities available to you to keep control over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time, and we will make it as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of all our newsletter emails).
- You have the right to ask for rectification and/or deletion of your information.
- You have the right to access your information.
- You have the right to object to the processing of your data
- You have the right to limit the processing of your data
- You have the right to have your data deleted

A full summary of your legal rights over your data can be found on the website of the [Belgian Data Protection Authority](#).

Please note that relying on some of these rights, such as the right to delete your data, will make it impossible for us to continue delivering some services to you. However, where possible INNODIA will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

## CHANGES TO THIS POLICY

INNODIA reserves the right to update or modify this Privacy Policy from time to time and will publish the most updated version on its website. If a modification meaningfully reduces your rights, INNODIA notifies those people whose data shared with INNODIA will be affected.

## CONTACT INNODIA

If you have any questions or concerns about this INNODIA Privacy Policy or data practices, please contact INNODIA at [privacy@innodia.org](mailto:privacy@innodia.org).

If necessary to process your request, we may ask you to identify yourself with e.g. a copy of the front of your identity card.

## DISPUTES

If you feel that INNODIA has not handled your request or complaint well enough and that your rights have been violated, you can contact the Belgian Data Protection Authority (former Privacy Commission, [www.gegevensbeschermingsautoriteit.be](http://www.gegevensbeschermingsautoriteit.be)) and file a complaint there.

This policy and INNODIA operations are governed by Belgian law. To the extent permitted by applicable law, the Courts and Tribunals of Leuven shall have jurisdiction in case of dispute.

*Version of this Privacy Policy 01: 30/06/2024*

# Addendum to INNODIA Website and Newsletter Privacy Policy

*Applicable to the INNODIA Early T1D Navigator Initiative*

This addendum supplements the INNODIA Website and Newsletter Privacy Policy above and applies specifically to data collected in the context of the **INNODIA Early T1D Navigator** initiative. By participating in this initiative, you acknowledge and agree to the data processing practices outlined below, in addition to those specified in the main Privacy Policy.

## TYPE OF DATA INNODIA PROCESSES

When we process your data, as part of the **INNODIA Early T1D Navigator** initiative, this concerns the data below:

- **Clinical Site Information:** Name of the site, location, contact details, and available screening and monitoring programs.
- **Contact Person Information:** Name, email address, and professional affiliation of individuals submitting information on behalf of a clinical site.
- **Other Relevant Data:** Any additional details voluntarily provided by clinical sites to support the initiative.

## HOW INNODIA USES YOUR INFORMATION

INNODIA uses the personal information collected through this initiative for the purpose of:

- Creating and maintaining a publicly accessible resource mapping clinical sites conducting early T1D screening and monitoring.
- Enabling individuals to locate the nearest participating clinical site for screening and/or monitoring.
- Contacting clinical sites to verify submitted information before publishing.

## LEGAL BASIS FOR PROCESSING

The processing of data for this initiative is based on:

**Consent:** By submitting your information, you consent to its inclusion in the publicly available INNODIA Early T1D Navigator.

**Legitimate Interest:** Ensuring accurate and up-to-date information about clinical sites supporting early T1D detection and monitoring.

## DATA SHARING

- The clinical site information collected will be made publicly accessible through the INNODIA Early T1D Navigator platform.
- Contact details of site representatives will not be shared publicly but may be used for verification and further communication related to the initiative.
- Data may be shared with third-party service providers supporting the platform's development and maintenance, subject to appropriate data processing agreements.

## DATA RETENTION

- Submitted data will be retained as long as the INNODIA Early T1D Navigator remains active or until a site requests removal.
- Contact information for site representatives will be reviewed periodically to ensure relevance and accuracy.

## CONTACT INNODIA

For any questions or concerns regarding this addendum, please contact INNODIA at [privacy@innodia.org](mailto:privacy@innodia.org).

This Addendum is intended to provide additional transparency regarding data processing for the **INNODIA Early T1D Navigator** initiative. It does not replace the general *INNODIA Website and Newsletter Privacy Policy*, which remains in effect for all other data processing activities.

*Version of this Privacy Policy Addendum 01: 15/03/2024*