

MEDICAL DOCTORS FOR CHOICE (MDFC)



IT PRIVACY POLICY

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Medicaldoctorsforchoice.org

Introduction

1. Policy objective

This policy has been made by Medical Doctors For Choice to define the proper use of information technology and related resources and data, and to ensure the security and technical integrity of the system. It explains when, why, and how we collect personal information about our members, our website and our mailing lists. This explanation includes how we use, store, and the conditions under which we may disclose it to others, and how we keep it secure. Inappropriate use of ICT assets exposes MDFC to risks including cyber attacks, compromise of network systems and services, and legal issues.

Under the Rwandan Law relating to the protection of personal data and privacy (DPP) Law No 058/2021 of 13/10/2021, MDFC qualifies as a “data controller”. This means that we are fully or partly responsible for determining the purpose and means for the processing of personal data. We are required under this law to inform the involved of the information contained within this privacy policy.

This policy applies to all MDFC personnel and outsourced providers having access to MDFC systems and data.

2. Definition of terms

personal data: any information relating to an identified or identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, psychological, genetic, mental, economic, cultural or social identity of that natural person.

sensitive personal data: information revealing a person’s race, health status, criminal records, medical records, social origin, religious or philosophical beliefs, political opinion, genetic or biometric information, sexual life or family details

processing of personal data: an operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as access to, obtaining, collection, recording, structuring, storage, adaptation or alteration, retrieval, reconstruction, concealment, consultation, use, disclosure by transmission, sharing, transfer, or otherwise making available, sale, restriction, erasure or destruction;

privacy: a fundamental right of a person to decide who can access his or her personal data, when, where, why and how his or her personal data can be accessed;

significant consequences: effects that are as similarly significant in their impact as legal effects and that adversely affect a data subject’s behaviour or choices;

legal consequences: effects that adversely affect a person’s legal status or his/her legal rights;

vital interests: interests linked to life or death of data subject;

personal data logging: the process of recording personal data processing activities over a period of time for the purpose of event monitoring and auditing in an automated processing system;



personal data breach: a breach of personal data security leading to unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

data subject: a natural person from whom or in respect of whom, personal data has been requested and processed;

recipient: a natural person, a public or private corporate body or legal entity to which the personal data are disclosed;

user: a natural person, a public or private corporate body or a legal entity, who uses or who requests personal data processing service;

consent of the data subject: freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by an oral, written or electronic statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

data controller: natural person, public or private corporate body or legal entity which, alone or jointly with others, processes personal data and determine the means of their processing;

third party: natural person, corporate body or legal entity other than the data subject, the data controller, the data processor and persons who, under the authority of the data controller, are authorised to process personal data;

competent authority: sectoral authority responsible for overseeing sector-specific compliance in conjunction with the supervisory authority;

supervisory authority: a public authority in charge of cyber security;

data processor: natural person, public or private corporate body or legal entity, which is authorised to process personal data on behalf of the data controller.

3. MDFC Commitment

In line with the core principles of the Rwandan Law relating to the protection of personal data and privacy **DPP**, we are committed to the following, in regards to our use of personal data:

- Lawful, Fair, consented and Transparent data collection: we are committed to ensuring that personal data is collected and stored in such a manner.
- Purpose Limitation: we are committed to ensuring the data we collect serves a purpose that is clearly informed to you.
- Data Minimization: In line with the previous item, we are also committed to limiting our collection to data that are strictly necessary for our purpose.
- Truth and Accuracy: we commit to ensuring that the data is kept as accurately and as up-to-date as possible.
- Storage Limitation: we will not be keeping personal data longer than we need it for a specific purpose.
- Integrity and Confidentiality: we commit to ensuring or enacting measures that will ensure personal data is afforded an appropriate level of security.

Whether it is through this privacy policy or otherwise, in the spirit of ensuring a higher level of transparency, we will strive our best to ensure that the involved understand the purpose of each data collection that we do, how we process it, and how he/she/they can correct or remove it, should he/she/they wish.



4. How Do We Collect Personal Information

The Medical Doctors For Choice collects personal information through several means:

Email and Written Correspondence

Application Forms

Enrollment Database

Direct contact at our office, events and elsewhere.

Social Media

Surveys and Research Forms

In nearly all instances, it will be apparent and clear to the involved when we are collecting your data.

5. What Personal Information do we collect

We collect information about you when you engage with us through one of the several activities detailed in the list below:

MDFC membership application forms

MDFC General Assembly, Meeting Training Events

Working Groups and/or Volunteering Opportunities within MDFC

External Representation Opportunities

Surveys and/or research activities through the MDFC network

In these cases, we may collect the information detailed below:

Name, Date of Birth, Place of Birth, and Country of Origin

Contact Information: Email Address, ID/Passport Data, Phone Numbers, postal or other physical addresses

Physical Data: Gender, Health Requirements (for provision of suitable services)

Curriculum Vitae, including current employment, past employment, education, and experience within a specific field related to the purpose of the data collection

Additional information that may be necessary based on a case-by-case basis.

Any additional need for information in any particular cases will be communicated clearly to the involved, including the reasons for its collection and duration of its retention.

6. How is personal information used

As we have mentioned, the personal data we actively collect from the involved is almost always related to one of the five activities listed under section five “What personal information do we collect”. At this moment, MDFC does not engage in targeted advertising, and thus we do not share any data with external parties for marketing or advertising purposes. The personal, identifiable data that we collect from you may be used for the following purposes:



Selection of participants to an MDFC activity

Selection of participants to represent MDFC in an event

Provision of service or information about our activities

Impact Assessment of MDFC Activities

Conveyance of information about opportunities and call for inputs to improve our service

Archived for a specific duration of time to ensure legal liability of related parties based on a specific, previously agreed upon terms that are amicable to both MDFC and the related parties

We will regularly review the necessity of these personal data for our activities and adhere to any storage period that we have detailed when requesting these data or until such time when the data is no longer necessary for the originally stated purpose, whichever comes first. Please note that in some cases, specific information items are indispensable to the related activity, and MDFC may not be able to select, provide, or convey the application for consideration without them.

7. What is the lawful basis of MDFC Data Collection

Based on the DPP, there are lawful bases on data collection, as outlined in Chapter II section 1 of the DPP law. At least one of these must apply whenever a party is processing personal data:

Consent: The individual has given an organization clear consent for processing personal data for a specific purpose.

Contract: The data processing is necessary for a contract that exists with the individual, or because they have asked to take specific steps before entering into a contract.

Vital interest: the processing is necessary to protect the vital interests of the data subject or of any other person;

Health Care: the processing is necessary for the purposes of preventive or occupational medicine, public health such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices;

Public interest: The data processing is necessary in order to perform a task in the public's interest or for the organization's official functions, and the task or function has a clear basis in law.

MDFC will ensure that at all times the lawful bases are respected, and at least one of the conditions stated above is fulfilled. All personal data collection activities by MDFC and its officers will be supervised by the MDFC Executive Board to ensure its compliance with the aforementioned basis.

8. Instances of Data Sharing with a Third Party

MDFC will not sell, rent, or otherwise share your personal data for marketing and targeted advertising purposes. We also would like to assure you that any instance of active data-sharing will happen only with your consent through a clearly distinguished explanation of the purpose of said sharing either before, during, or after the data collection process. The following are the entities with whom we may share data with and for what reason:

Organizers of International Events: at some points, we will need to share specific personal data with organizers of international meetings to ensure that they will be able to provide adequate and suitable services to the applicants.



Agencies, Institutions, or Academics for Research Purposes: we may allow third party organizations to engage with our network for data collection or research purposes. In all cases, we will ensure that the process is compliant with our research policies and that the data collection contains as little identifiable data as possible.

Software or Technical Providers: third-party agents that allow us to operate efficient digital processes and render satisfactory service to our members.

Law Enforcement or Regulatory Bodies: we may have to transfer specific data if we are under the duty to disclose or share your personal data in order to comply with any legal obligations or to protect the rights, property, or safety of other members and users.

This is an indicative and not an exhaustive list. Please note that whenever we share personal data, we take all reasonable steps to ensure that it will be handled appropriately and securely by the third party. In all instances, we will share only information that is absolutely relevant and clearly necessary to deliver the service or fulfill the purpose of the data sharing. Especially with partners that are not directly related to our organization (i.e., those other than “Members”), we will have a contract in place to ensure secure handling of these pieces of information and clearly limit the way they will be able to use the shared data. In the case of Law Enforcement and Regulatory Bodies, where contracts are not applicable, we will continue to make all reasonable efforts to ensure that your privacy remains protected.

9. How Long Do we Retain Personal Information:

We retain personal information only as long as it is necessary for the purpose of the data collection. This purpose will be detailed during the data collection process. In general terms: we will retain personal data for so long as required by law, or as may be required for record keeping and legal claims purposes

10. Where Do We Store Personal Information

We store most of the data we collect in our google suites connected domain and our web hosting service provided by a third-party company based in a Rwanda. In all cases, we strive or will continue to strive to ensure that the organizations we work with have adequate data-protection and confidentiality clauses on data collection that are compliant with the regulations set out within the DPP.

11. Security precautions in place to protect the loss, misuse or alteration of your information

We will be putting in place a robust internal guideline on personal data management within our organization. This will allow us to keep track, limit, and in specific cases: remove access to user personal data from administrators within our organization. In all cases, personal data are only shared to officers who require it to complete a specific purpose, in line with what will be detailed during the data collection process.

Additionally, to reduce uncontrollable data dissemination and improve our ability to control access to the personal data we collect, we regularly request and strive to ensure that our officers work in a cloud-based environment fully within the medicaldoctorsforchoice.org domain. We will continuously strive to ensure the storage of these personally identifiable pieces of information is done as securely as possible.

12. Other Websites

Parts of MDFC website medicaldoctorsforchoice.org may contain links to other sites, such as related agencies with source material that supports our content, or partner organizations that we work with. We would like to clarify that we are not responsible for the content or privacy practices of these other sites and we encourage you to be aware of the privacy policies of these sites before engaging in any actions.



13. Your rights where we are processing your information:

The law relating to the protection of personal data and privacy highlights certain rights to the subject whose information is being collected by an organization (as data subjects). The following is a quick summary of your rights pertaining to data collected by MDFC:

Access: Subject have the right to request the personal information that we have about him/her/they. If he/she/they would like a copy of this activity, contact us at the email address medicaldoctorsforchoice@gmail.com includes:

- Information relating to the purposes of the processing of personal data;
- A copy of personal data;
- A description of personal data that the data controller or the data processor holds, including data on the contact details of a third party or the categories of third parties who have or had access to personal data;
- The source of the personal data in case his or her personal data have not been obtained from the data subject;
- To inform about any transferred of personal data to a third country or to an international organisation.

Correction: you have the right to request a rectification to incomplete, inaccurate, or false information on your personage within our possession.

Deletion: you have the right to request the deletion of parts or the entirety of your personal data within our possession without undue delay on these grounds:

- Where you feel the data is no longer necessary in relation to the purposes for which they were collected or processed, where you are withdrawing consent for the use of your data, where you have objected to the use of the data, Where you feel the use of the data is contrary to the law

Objecting: you are free to object to our use of your data at any time for marketing, newsletter, or mailing list purposes. Unless there are overriding legitimate grounds, we will cease the usage of these personal data immediately.

Withdrawing Consent of Use: the regulations dictate that withdrawing consent should be as simple as providing it. As such, you are free to withdraw your consent for data that we have collected, and we will cease our use of the information immediately for the purpose(s) that you have consented to in the first place.

Please note that specifically for mailing list purposes, instructions to subscribe or more importantly, unsubscribe from receiving information from MDFC can be found in here. You may also directly contact us or fill this form to be unsubscribed from one of our mailing lists.

14. Contact Information:

Should you find some infringements that you would like to be rectified or would like to find more information on our privacy policies, please contact us at medicaldoctorsforchoice@gmail.com with the subject [DPP] in the subject line.

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