



Privacy statement

At Erasmus MC we are working hard to improve and renew the healthcare of today and the public health of tomorrow. We are doing this by providing healthcare, through groundbreaking scientific research, and teaching and education. If you are one of our patients, participate in one of our medical research projects, are enrolled in one of our courses, or work at Erasmus MC, we process your personal data. Below you can read exactly what the processing of your personal data involves, what personal data we process and for what purpose, what your rights are, and who to contact for questions regarding your privacy.

Patients

What exactly does the processing of your personal data involve?

From the moment that you register as a patient with Erasmus MC, we process various personal data, including your name, address, date of birth, and your BSN (your citizen service number). For the purpose of your treatment, we also process information on your health in your patient records. By the processing of personal data we mean that we will register, consult, and store your personal data, and possibly will make it available to rightful recipients (such as other care providers to whom you are referred).

Are you the patient's contact person or legal representative?

If you are the contact person or legal representative of an Erasmus MC patient, we will process a limited amount of your personal data, such as your name, contact details, and your relationship to the patient. We need this information to be able to contact you.

For what purposes does Erasmus MC process your personal data?

Erasmus MC needs your personal data to provide you with the best possible care. The purposes and reasons for processing your personal data include:

- ❖ Providing your treatment and other services. We process your personal data so that we can contact you and respond to any questions you ask us, so that we can send you invitations, or appointment reminders, and so that we can diagnose, treat, and provide you with aftercare. Your patient records include your medical details, including what your physician tells you, how you perceive your health and healthcare outcomes, results of examinations and tests, diagnoses, and treatment plans.

- ❖ Identification. We need your personal data to be able to identify you and to ensure that you are not mistaken for another patient. We want to be sure that you receive the right treatment and that all the information relating to your treatment is stored in your patient records so that, when necessary, it can be shared with other care providers. In some cases we may ask you to present a valid ID.
- ❖ Complying with legal obligations. We process your personal data so that we can comply with various legal obligations, such as creating a medical record and reporting infectious diseases which pose a serious threat to public health. Erasmus MC is also obligated to monitor the quality of healthcare, and to this end we provide data which cannot be traced back to patients, to national quality registrations.
- ❖ Protection of legitimate interests. Your personal data are also processed to protect the legitimate interests of Erasmus MC. For instance, it could be necessary to process your personal data to conduct a quality assessment or to deal with a complaint you may have against Erasmus MC or one of our employees. We also process your personal data to carry out administrative and other internal management activities, such as claiming the costs for your care from your health insurer.
- ❖ Medical research. In some cases we are entitled to use your data for medical research without your consent. This includes medical data and tissue samples that we obtained during your hospital visit, examination, or treatment. If you prefer your data not to be used for this purpose, you can object to such use. More information on medical research using your data or tissue samples, and on objecting to this use, can be found [here](#) (*This brochure will be available in English version soon.*) In all other cases we will ask for your informed consent for participation in medical research.

What are Erasmus MC's underlying principles for processing personal data?

Erasmus MC observes the following underlying principles for processing personal data:

- ❖ We do not process more personal data than necessary to achieve the objectives mentioned above.
- ❖ We do not process the personal data longer than necessary. Depending on the nature of the data, they are held for a fixed retention period. Your patient records, for example, are held for at least 20 years after your treatment has been completed. As a university medical center, we keep certain data from your medical records such as discharge letters, surgery reports, anesthesia reports, and pathology results, for 115 years from your date of birth.
- ❖ Only staff members directly involved in your treatment or those performing related tasks have access to your personal data that they need to carry out their tasks.
- ❖ All staff members involved in your treatment are held to strict standards of confidentiality and will not share your data with others if there is no legal or medical reason to do so. However, if we think sharing your data is beneficial, we will always ask for your consent, unless, in exceptional

circumstances, we can invoke circumstances beyond our control or a conflict of obligations. In some cases we are legally bound to share your data with others, such as your health insurer, the Health and Youth Care Inspectorate, and national quality registers.

- ❖ Erasmus MC sometimes engages the help of a third party to deliver certain services. In these cases, Erasmus MC makes agreements with the third party (the 'processor') to guarantee the confidential and careful use of personal data. These agreements are documented in a processor agreement.

What are your privacy rights?

You have the following rights in respect of the personal data we process about you:

The right to access and obtain a copy of your patient records. You can view the personal data we hold on you and your complete patient record. You can access a great deal of your data via our digital patient portal Mijn Erasmus MC (My Erasmus MC). If you are not satisfied with the information provided on the digital patient portal, you can ask your physician for access to your records. The physician must comply with your request for access, but may block certain parts of your records, including personal notes or information about a family member. You can also ask us to provide you with a copy of your patient records. You will find the procedure for requesting a copy of your patient records [here](#).

- ❖ The right to data portability. If we conduct digital processing of the personal data that you provided, you can request that we provide you with this personal data in a digital format, so that you can move and use that data and potentially transmit it to another hospital or care provider. The right to data portability only applies to data that you yourself have made available to Erasmus MC, such as data from your pacemaker or blood pressure monitor, and does not apply to information recorded by your physician, such as suspicions, diagnoses, and treatment plans. If you wish to receive certain digital data, you can inform your attending physician accordingly.
- ❖ The right to rectification. If we have processed your personal data and it is inaccurate, you can request us to rectify the data. The rectification of data may be necessary if, for example, you have moved or we made a mistake when registering your data. You can only have data that is demonstrably inaccurate rectified; a diagnosis cannot be rectified, for instance. However, you can add your own views to your patient records, such as the outcome of a second opinion. If you wish to rectify any data or add information to your records, you can inform your physician accordingly.
- ❖ Right to object. If we process your data for a legitimate interest (e.g. to carry out qualitative research) or to carry out a task in the public interest (e.g. conducting medical research) and you would prefer us not to do so, then you can inform your attending physician that you wish to object to the processing of your data.

- ❖ The right to erasure. You can request us to erase your patient records or parts of it. There are cases in which we do not have to comply with your request to erase your patient records. If it is in your own interest or that of third parties (a family member, for instance) to keep all or parts of the records, your physician may refuse your request for erasure. We may also refuse erasure if a legal obligation precludes erasure.

Do you have a question or complaint?

At Erasmus MC we are committed to providing you with the best possible service, and we do our utmost to protect the personal data that we process about you. If you have any questions about your privacy at Erasmus MC, you can contact our Data Protection Officer. You can reach the Data Protection Officer by email at functionaris.gegevensbescherming@erasmusmc.nl. Please contact the Complaints Officer if you have you inadvertently had a negative experience or if we do not meet your expectations when it comes to privacy, see [this page](#) for information on how to file a complaint. You can also submit your privacy complaint to the Data Protection Officer or the Dutch Data Protection Authority.

Participating in medical research

What exactly does the processing of your personal data for medical research involve?

Erasmus MC is a university medical center, which means that we not only treat patients, but that we also conduct medical research. We engage in these research activities to find better treatments for diseases, gain an improved understanding of diseases, or identify a disease. As part of our medical research we process some of your personal data, including your age, gender, and health details. When we process personal data we register, consult, and store your personal data, and after the termination of the statutory retention period we will also destroy the data.

In some cases we are entitled to use your data for medical research without your consent. This includes medical data and tissue samples that we obtained during your hospital visit, examination, or treatment. If you prefer your data not to be used for the purpose, you can object to such use at your treating physician. More information on medical research using tissue samples, and on objecting to this use, can be found [here](#). *(This brochure will be available in English version soon.)* In all other cases we will ask for your explicit consent to participate in medical research.

What are Erasmus MC's underlying principles for processing personal data?

Erasmus MC observes the following underlying principles for processing personal data:

- ❖ Where possible, we use anonymous or pseudonymous data for research purposes, which means that the data cannot be traced directly to you.

- ❖ We only process as much personal data as is necessary for the purpose of the medical research that we inform you about in advance using the consent form.
- ❖ We do not process the personal data longer than necessary. As a rule, data that was collected as part of medical research is usually kept for at least 15 years so that the reliability of the study can be checked afterwards.
- ❖ Your personal data can only be accessed by persons involved in the medical research that you are participating in. We will inform you in advance of the people involved in the medical research through the consent form. The data collected as part of medical research will not be included in your patient record. This means that if your attending physician is not the researcher conducting the study, he/she will not have access to your research results.
- ❖ All those involved in the medical research that you are participating in are required to observe confidentiality and may only share your data with others if you have given your consent to do so on the consent form.
- ❖ Erasmus MC sometimes engages the help of a third party to conduct certain parts of the study (such as analyzing the research data). In these cases, Erasmus MC makes agreements with the third party (the 'processor') to guarantee the confidential and careful use of personal data. These agreements are documented in a processor agreement.

What are your privacy rights?

You have the following rights in respect of the personal data we process about you:

- ❖ The right to access and obtain a copy of the research results. If you participate in medical research, you may access or request a copy of the personal data that we process about you. This includes data from your patient records, as well as data that was obtained especially for the study, for example by means of questionnaires. At any time during the research study, you can request access to your personal data or a copy of it, but you can also ask for a justification of why and how your data is being used for the medical research. The contact details of the researcher can be found on the consent form that you received prior to the study.
- ❖ The right to rectification. If we have processed your personal data and it is inaccurate, you can request us to rectify the data. The rectification of data may be necessary if, for example, you have moved or we made a mistake when registering your data. If you wish to change any details, inform the researcher mentioned on the consent form.
- ❖ Right to object. If we process your data for a legitimate interest (e.g. to carry out qualitative research) or to carry out a task in the public interest (e.g. conducting medical research) and you would prefer us not to do so, then you can inform your attending physician that you wish to object to the processing of your data.

- ❖ If you wish to have personal data that was collected as part of medical research deleted, inform the researcher mentioned on the consent form accordingly. Different rules for deleting personal data apply to medical research than to patient care. As a rule, data that was collected as part of medical research is usually kept for at least 15 years so that the reliability of the study can be checked afterwards. This means that you cannot always have your personal data deleted immediately. If you consented to the storage of your data in a databank or biobank for future medical research, you can request immediate removal of your data from the databank or biobank. You can address this request to the researcher mentioned on the consent form.

Do you have a question or complaint?

At Erasmus MC we are committed to providing you with the best possible service and we do our utmost to protect the personal data that we process about you. If you have a question or a complaint about your privacy at Erasmus MC, you can contact our Data Protection Officer. You can contact the Data Protection Officer by email: functioaris.gegevensbescherming@erasmusmc.nl. You can also submit your privacy complaint to the Data Protection Officer or the Dutch Data Protection Authority.

Alumni, students and others participating in courses or training programs

What exactly does the processing of personal data for educational purposes involve?

If you are enrolled in one of Erasmus MC's courses or are an alumnus, we process a number of your personal data, including your name, address, date of birth, and possibly your course results. When processing your personal data we register, consult, and store your personal data, and possibly make it available to rightful recipients (such as other universities participating in exchange programs), and after termination of the statutory retention period we will also destroy the data.

For what purposes does Erasmus MC process personal data?

Erasmus MC needs your personal data to provide you with the best possible support and services. The purposes and reasons for processing your personal data include:

- ❖ Providing services. We process your personal data so that we can organize, plan and provide education, can contact you and respond to any questions you ask, can inform you of matters related to your study or student facilities or other education-related matters, can assist and support you, and can issue you with certificates, diplomas, or grades. Our student administration office processes your course and exam results.

- ❖ Identification. We need your personal data so that we can identify you and to ensure that you are not mistaken for someone else enrolled in one of our courses. We want to be sure that we provide you with the right services and that all the information relating to you is stored under your name in our student administration files and, where necessary, can be shared with others (such as DUO, the Education Executive Agency).
- ❖ Complying with legal obligations. We process your personal data so that we can comply with various legal obligations, such as tax administration and retention duties.
- ❖ Protection of legitimate interests. Your personal data are also processed to protect the legitimate interests of Erasmus MC. For instance, it could be necessary to process your personal data to assess and/or improve the quality of our education and services or to process your complaint against or dispute with Erasmus MC or one of our employees. We also process your personal data to carry out administrative and other internal management activities, such as calculating, documenting, and collecting amounts due.
- ❖ Scientific research. In some cases we use personal data when conducting scientific research on education.

What are Erasmus MC's underlying principles for processing personal data?

Erasmus MC observes the following underlying principles for processing personal data:

- ❖ We do not process more personal data than necessary for the course(s) you are enrolled in at Erasmus MC.
- ❖ We do not process your personal data longer than necessary and we do so in accordance with the statutory retention periods.
- ❖ Your personal data are thoroughly protected and secured and only accessible by persons authorized to access the data.
- ❖ Erasmus MC sometimes engages the help of a third party to deliver certain services. In these cases, Erasmus MC makes agreements with the third party (the 'processor') to guarantee the confidential and careful use of personal data. These agreements are documented in a processor agreement.
- ❖ We also share your data with others if we are legally required to do so or if you have authorized us to do so, such as government bodies (e.g. DUO, the Dutch Tax and Customs Administration, and ministries (for grants, etc.)), investigation authorities, and other universities.

What are your privacy rights?

As someone enrolled in one of Erasmus MC's courses you have a number of rights in respect of the personal data we process about you. You have the right to access the personal data that we process about

you, you can have your personal data rectified, get information added and in a number of cases have data deleted. In certain cases you can object to the processing of data. You can submit your request to access your personal data or have data rectified or added to the organizational unit providing the course.

Bachelor's and Master's students can contact the OSC (osc@erasmusmc.nl) and all other participants of training programs or courses can contact Erasmus MC Academy (academie@erasmusmc.nl). In other cases you can contact the organizational unit where you enrolled in your course or training program.

Do you have a question or complaint?

At Erasmus MC we are committed to providing you with the best possible service, and we do our utmost to protect the personal data that we process about you. If you have a question or a complaint about your privacy at Erasmus MC, you can contact our Data Protection Officer. You can contact the Data Protection Officer by email: functionaris.gegevensbescherming@erasmusmc.nl. You can also submit your privacy complaint to the Dutch Data Protection Authority.