



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

23 November 2020
EMA/631944/2020

European Medicines Agency's Privacy Statement For the use of audience interaction tool Slido

This Privacy Statement explains the most essential details of the processing of personal data by the European Medicines Agency (hereinafter "EMA" or "Agency") in the context of meeting or events where the audience interaction tool Slido is used to interact with participants. At certain points throughout a meeting or event, the meeting organisers may invite the audience to give input or ask questions through Slido. Participating in the Slido interaction is voluntary and participants can opt to remain anonymous while using the platform.

1. Who is responsible for processing your data?

1.1. Who is the data controller?

The European Medicines Agency ("EMA") is ultimately responsible to comply with your data protection rights and freedoms. On behalf of EMA, the Head of Administration and Corporate Management Division is appointed as a 'Internal Controller' to ensure the proper implementation of the processing operation.

Should you wish to get in touch with the internal controller, please contact:
datacontroller.administration@ema.europa.eu

1.2. Who is the data processor?

The Agency is engaging with Slido as a third-party service provider to process data on behalf of the Agency for audience interaction services. The contact details of the data processor(s) are the following:

- sli.do s. r. o., Vajnorská 100/A, 831 04 Bratislava, Slovakia
- Data Protection Officer at dpo@slido.com

2. Purpose of this data processing

The purpose of this data processing activity is to facilitate dialogue and participant engagement with internal or external participants of meetings and events, in the context of performing of the Agency tasks, including:

- Managing questions and answers during meetings and events;
- Capturing input and feedback from participants on specific topics via polls, questions or quizzes.

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Address for visits and deliveries Refer to www.ema.europa.eu/how-to-find-us

Send us a question Go to www.ema.europa.eu/contact **Telephone** +31 (0)88 781 6000

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2.1. Personal data concerned

In this processing operation we process data directly collected from you when you submit information via Slido. You will be invited to provide input by opening a browser on your device, going to www.slido.com and entering the event code of the meeting or event you are attending. Such data may include the following:

- User content data, i.e. your answers to questions created by the event organisers or questions you have submitted to event organisers through the platform. This content data is anonymous and may be used for the stated business purpose of the event (e.g. capturing input and feedback to be used in the context of the respective business task) and/or for communication following the event (e.g. publication of testimonials on the business purpose).
 - If you include identifying personal data in your responses (e.g. including your name and organisation in free text answers), it is considered you provide consent for this data to be used by EMA event organisers for the business purposes. The EMA event organiser may choose to anonymise this data, either through aggregation or redaction.
- User profile data: You may opt to remain anonymous through the entire interaction on Slido, as EMA event organisers will not require you to provide your name or email address, and will not create questions asking about yourself, or your contact details. Optionally, you may create a profile on Slido with your name, email address and company. Not all fields are required. If you choose to create a profile:
 - Your name will be visible to all participants in the questions you submit for Q&A.
 - Your name, email address and company will be available to the EMA event organisers in the analytics exports which can be run following the event.
 - You may revoke consent of this at a later stage, by deleting your profile. Once you delete your profile, the data held on Slido will become anonymous (e.g. changing from “participant X asked question Y” to “anonymous asked question Y”). Reports exported before the profile was deleted will retain the personal data.
- User technical data, for example IP addresses or device information, is processed by Slido as data controller, and is used for the provision, tailoring and improvement of their services. Technical data is never shared with EMA (see the Slido [Privacy Policy](#)).

If you do not create a profile, participant content data remains anonymous and will not be related to any individual respondent, such as ‘likes’ you make on existing questions or content shared by you when answering polls.

2.2. Legal basis of the processing

When you provide your data, you consent to the processing of that data in accordance with this Privacy Statement. You have the right to withdraw your consent later at any time.

You may also opt-out from the processing by remaining anonymous and not creating a profile in the tool.

3. How long do we keep your data?

If you have created a profile and submitted a question, your name and question asked may be retained as part of the records of the meeting or event, in line with the data retention provisions of the recordings, e.g. screen displays in audio-visual recordings, if applicable.

If you have created a profile and submitted a question or answered polls, your profile information will be available to EMA meeting organisers via the analytics reports on the Slido platform. An automatic data retention policy is set up to delete all data related to the event 6 months after the event.

If you created a profile, you can delete your profile at any time. Once deleted, the personal information will change to 'anonymous' and will no longer be visible to EMA event organisers. Any reports exported before the profile was deleted will retain the personal data. Reports will be deleted by event organisers 6 months after the event.

4. Who has access to your information and to whom is it disclosed?

The user content and user profile data collected will be processed internally by staff within the EMA division organising the meeting or event.

User technical data will be processed by Slido in line with their applicable privacy policy.

5. Your data protection rights

As data subject (i.e. the individual whose personal data is processed), you have a number of rights:

- **Right to be informed** – This Privacy Statement provides information on how EMA collects and uses your personal data. Requests for other information regarding the processing may also be directed to the Internal Controller.
- **Right to access** – You have the right to access your personal data. You have the right to request and obtain a copy of the personal data processed by EMA.
- **Right to rectification** – You have the right to obtain - without undue delay - the rectification or completion of your personal if it is incorrect or incomplete.
- **Right to withdraw consent** – You have the right to withdraw your consent to the processing of your personal data. However, this will not affect the lawfulness of any processing carried out before consent is withdrawn.
- **Right to erasure** – You have the right to require EMA to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing. In certain cases your data may be kept to the extent it is necessary, for example, to comply with a legal obligation of the Agency or if it is necessary for reasons of public interest in the area of public health.
- **Right to restrict processing** – In a few, codified cases, you have the right to obtain the restriction of the processing, meaning that your data will only be stored, but not actively processed for a limited period of time. For more information about this right and its limitations, see the EMA General Privacy Statement, hosted at www.ema.europa.eu/en/about-us/legal/privacy-statement.
- **Right to portability** - Where the processing is carried out based on your consent and in automated means you have the right to receive your personal data (which was provided to the EMA directly by you) in a machine-readable format. You may also ask the EMA to directly transfer such data to another controller.

The rights of the data subject can be exercised in accordance with the provisions of Regulation (EU) 2018/1725. For anything that is not specifically provided for in this privacy notice, please refer to the

contents of the general EMA Privacy Statement: www.ema.europa.eu/en/about-us/legal/privacy-statement. Slido's privacy policy is available at <https://www.sli.do/terms#privacy-policy>

6. Recourse

In case you have any questions regarding the processing of your personal data, or you think that the processing is unlawful or it is not in compliance with this Privacy Statement or the general EMA Privacy Statement, please contact the **Internal Controller** at datacontroller.administration@ema.europa.eu or the **EMA Data Protection Officer** at dataprotection@ema.europa.eu.

You also have the right to lodge a complaint with the **European Data Protection Supervisor (EDPS)** at any time at the following address:

- Email: edps@edps.europa.eu
- Website: www.edps.europa.eu
- Further contact information: www.edps.europa.eu/about-edps/contact_en