



GDPR Policy for the BSI newsletter & forum

- 1.1 According to the guidelines of the General Data Protection Regulation (GDPR), 25 May 2018, we hereby inform you that we process personal data lawfully, fairly, and in a transparent manner in relation to the data subject based on Art. 6 Para. 1 lit. a, 7 of the GDPR.
- 1.2 The newsletter is managed through the email service provider MailChimp:
<https://mailchimp.com/>
- 1.3 The forum is provided and support by LimesGroup: <https://limestec.de/>
It is hosted on the Blue Shield International website.
- 1.4 The statistical surveys and analyses that are performed and the data of both newsletter and forum are processed based on our legitimate interests pursuant to Art. 6 Para. 1 lit. f of the GDPR.
- 2.1 The newsletter is aimed at members of the Blue Shield, but Blue Shield International do not restrict who may sign up, or monitor whether they are a member of the Blue Shield.
- 2.2 The forum is for all members of the Blue Shield, including national committees, the Board and the Secretariat. All registrations must be vouched for by the President of a National Committee or their nominated communications representative.
- 3.1 We only send newsletters reporting the updates about the work of the Blue Shield or on topics of interest with the consent of the recipients or legal permission. The Blue Shield newsletters provide information about the activities carried out by the Board of Blue Shield International (BSI) as well as Blue Shield national committees. The latter information is collected by the Secretariat of the BSI or is deliberately provided by national committees for circulation among the members of the network of the Blue Shield.
- 3.2 Forum users are responsible for the content of the forum and can post news, event notifications and discussion topics. Advertisement of services is not allowed, though recommendations may be made on request.
- 3.3 All posts must be relevant, appropriate, and respectful.
- 3.4 Blue Shield International cannot guarantee the confidentiality of posts made as the forum is not moderated. However, posts which breach these guidelines will be removed. Repeated offenders may have their accounts blocked.
- 4.1 We have determined that our legal basis for data processing will be on “legitimate interests”. We have determined that this is appropriate because we use data in a way that the data subject would reasonably expect, and we believe there is a minimal privacy impact. Our legitimate basis is the pursuit of our services as detailed above.
 - The storage and processing of personally identifiable information is necessary for this purpose - to this end we will store and process only the information required maintain communications between the Blue Shield.
 - We do not conflict with the Data Subjects interest in this manner and base this assumption on the fact that they will have a reasonable expectation that we will need to store and process their data order to perform this service.
- 4.2 *Benefit*: In terms of benefit, we benefit from being able to pursue our legitimate interests in maintaining communications between the Blue Shield network.

- 4.3 Blue Shield national committees benefit through our support, and in maintaining this communication. There are no wider public benefits.
- 4.4 *Impact:* If we were unable to operate in the above way, our network would suffer significantly.
- 4.5 *Use of data:* We will not use the data in any unethical or unlawful way.
- 4.6 *Necessity:* The processing furthers the interests of the Blue Shield Board, and the interests of Blue Shield committees. The processing of data and the matching of candidates to receive the newsletter (i.e. those response for national committee communications) and to join the forum is reasonable and fair. There is no way that we can best serve national committee interests by collecting less data or operating in a less intrusive way.
- 4.7 *Possible impacts:* As far as the storage and processing of personal information is concerned, we do not believe there is any possible impact on the Data Subject because of the storage.

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- 5.1 In 2018, national committees were contacted to inform them a regular newsletter was being prepared to allow them to opt out before it was sent. On the 20th December 2018, an email was sent to the board of BSI and members of national committees to allow them to opt-out of our mailing list.
- 5.2 Personal information (first name, surname, committee position, name of the national committee of the Blue Shield, and email address) is stored in a password protected file and is accessible only by the Secretariat of the Blue Shield. These details will not be shared with any third parties without people's explicit consent.
- 5.3 The newsletter is dispatched by "MailChimp", a newsletter distribution platform of the US provider Rocket Science Group, LLC, 675 Ponce De Leon Ave NE #5000, Atlanta, GA 30308, USA.
- 5.4 The email addresses of our newsletter recipients and their further details described above are stored on the MailChimp servers in the USA. MailChimp uses this information to send the newsletters and provide evaluation/use data on our behalf. MailChimp can, by its own admission, also use this data to enhance or improve its own services, e.g. to technically enhance the dispatch procedure and display of the newsletter, or for commercial purposes to be able to determine which countries the recipients are from. However, MailChimp will not use the data of our newsletter recipients to contact them itself or forward it to third parties. We trust the reliability, IT security and data security of MailChimp. MailChimp is certified under the US-EU data privacy agreement "[Privacy Shield](#)" and agrees to comply with the EU data privacy guidelines. We have also concluded a "[Data Processing Agreement](#)" with MailChimp. This is an agreement in which MailChimp is obligated to protect the data of our users, to process it in accordance with its privacy policy on our behalf and must not forward this information to third parties. You can view the [MailChimp privacy policy here](#).
- 5.5 Our emails contain a "web beacon", i.e. a pixel-size file that is retrieved from the MailChimp server when opening emails. This involves the retrieval of technical information such as information on the browser and your system, as well as your IP address and the time of retrieval. This information is used to make technical improvements to services based on technical data or the target groups and their reading behaviour based on their retrieval locations (that can be determined with the IP address) or access times.
- 5.6 The statistical surveys also involve determining whether the newsletters are opened, when they are opened, and which links are clicked on. This information may be assigned to individual

newsletter recipients for technical reasons, but it is neither our intention nor that of MailChimp to monitor individual users. The evaluations instead help Blue Shield International to recognise the reading habits of our users and to adapt our content to them or to send different content based on our users' interests.

5.7 The data deposited with us for the purpose of accessing the forum will be stored by us until you ask us to delete your forum account. We reserve the right to delete or block e-mail addresses from forum access at our own discretion within the scope of our legitimate interest in accordance with Art. 6(1)(f) GDPR.

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6.1 The forum is hosted on the Blue Shield International website and supported by LimesTec, who have access to user information.

6.2 Users of the forum consent to the use of their data for legitimate purposes by filling out the sign-up form.

6.3 Every user must confirm GDPR by clicking a field and by that can opt-in the forum.

6.4 Details of every sign up is sent to the relevant National Committee President or their nominated communication officer for verification.

6.5 Personal information (first name, surname, committee position, name of the national committee of the Blue Shield, and email address) is stored in a password protected file and is accessible only by the Secretary and Secretariat of the Blue Shield. These details will not be shared with any third parties without people's explicit consent.

6.6 Statistical surveys involve determining Forum use (new topics, posts, views, users and who is online) and are used to monitor and increase Forum engagement, and improve user experience.

6.7 The data deposited with us for the purpose of accessing the forum will be stored by us until you ask us to delete your forum account. We reserve the right to delete or block e-mail addresses from forum access at our own discretion within the scope of our legitimate interest in accordance with Art. 6(1)(f) GDPR.

6.8 The processing of the information entered the forum shall occur exclusively based on your consent (Art. 6(1)(a) GDPR). You consent to the use of your email, and for your posts to be archives on the forum. You may revoke your consent at any time by sending an email to emma.cunliffe@blueshield-international. This shall be without prejudice to the lawfulness of any data processing transactions that have taken place to date.

6.9 Data stored for other purposes with us remains unaffected.

7.1 The GDPR does not set a specific time limit for consent. For this reason, we will seek fresh consent only if the purposes for which we process personal details will change from those specified in the Paragraph 2.

7.2 Newsletter recipients and forum users may opt-out of receiving our newsletter / subscribing to the forum AT ANY TIME, i.e. withdraw their consent.

7.3 For newsletter recipients, this means they also no longer consent to the distribution of this newsletter via MailChimp and the statistical analyses. It is not possible to cancel the distribution

via MailChimp or the statistical evaluation separately. A link to unsubscribe to the newsletter can be found at the end of each BSI newsletter, or alternatively you can email the Secretariat of the Blue Shield (Dr Emma Cunliffe emma.cunliffe@blueshield-international) to have your details removed from our mailing list.

- 7.4 For forum users, a link to remove access to the forum can be found at the sign-up/out form or alternatively you can email the Secretariat of the Blue Shield (Dr Emma Cunliffe emma.cunliffe@blueshield-international) to have your access removed from the forum.
- 8.1 The BSI Newsletter is an internal document for national committees – Committee Presidents are welcome to share it amongst their members but we are unable to add non-Blue Shield members to the mailing list. The BSI Forum is intended solely for Blue Shield members.
- 8.2 BSI assumes no responsibility for errors or omissions in the contents of the newsletter or information shared on the Forum. In no event shall BSI be liable for any special, direct, indirect, consequential, or incidental damages or any damages whatsoever, whether in an action of contract, negligence, or other tort, arising out of or in connection with the use of the newsletter, forum, or their content.
- 8.3 BSI reserves the right to make additions, deletions, or modification to the contents of the newsletter at any time without prior notice. BSI does not warrant that the newsletter is free of viruses or other harmful components.
- 8.4 BSI newsletter and Forums may contain links to external websites that are not provided or maintained by or in any way affiliated with BSI. Please note that the BSI does not guarantee the accuracy, relevance, timeliness, or completeness of any information on these external websites.

9.1 For questions on the collection, processing, or use of personal data, for information or for corrections, please contact the Secretariat of the Blue Shield at the following address:

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United Kingdom

Email: emma.cunliffe@bluehsield-international

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By
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