

## Privacy Notice

This privacy notice explains what personal data EMBL collects, for what purposes, how it is processed, and how we keep it secure, in the context of:

EMBL Alumni Association registration and participation

### 1. Who is responsible for the processing

The EMBL data controller (and joint-controller if applicable) contact details are:

EMBL Heidelberg  
Meyerohofstraße 1 69117 Heidelberg Germany  
+49 6221 387-0  
info@embl.de

### 2. What personal data do we process

The following categories of personal data may be processed:

Core Personal Information: Basic identifiers (name, date of birth, nationality); Contact details (email, phone, address); Professional details (employer, job role, department).

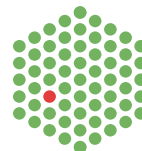
Account & Technical Data: Login credentials; System access logs; Usage data and cookies.

Professional & Academic Data: Publications and presentations; Research interests and activities.

Event & Communication Data: Communication preferences; Event registration and attendance; Feedback and surveys.

For the registration: pictures if you provide it, EMBL employment details (including dates of your employment, your EMBL position, group and unit), awards and links to social media, Alumni membership details (e.g. date of joining or type of membership), Volunteering activities, Subscriptions (e.g. an annual report or a newsletter), Our communications with you (including date, content of formal messages and engagement statistics), Link to another EMBL alumna/us as spouse (if known).

For the Alumni Directory: Personal details (e.g. name, last name, current place of work, facility to send the individual an e-mail, picture if you provide it), EMBL employment details (including dates of your employment, your position and the group and unit you worked for), Address details (e.g. city, postcode, country), Biographical information, awards and links to publications and social media.



If applicable, the following categories of sensitive data may be processed:

Data revealing relationship to another EMBL alum as spouse, where this is provided by the person themselves.

### 3. For what purposes do we process your personal data

Your personal data will be processed for the following purposes:

Custom value:

Your data will be processed for the purposes of facilitating contact with EMBL alumni, EMBL alumni statistics and reports, volunteer engagement activities, promotion of EMBL news and events, and for provision of additional event services like surveys, campaigns and calls to action, as well as involving you in various mailing list activities.

EMBL's Office of Alumni Relations also maintains an online Alumni Directory accessible to all members of staff (via the Intranet) and to all members of the EMBL Alumni Association via login. Some of the data in the Directory comes from the CRM, and other data is provided by you.

### 4. What is the legal basis for processing

We rely on the following legal basis(es) to process your personal data:

By joining the Alumni Community, you consent based on Article 6(3) of IP68, that we process the personal data you provide for the purposes listed above. You may withdraw your consent at anytime by writing an email.

The processing of health data is based on consent (Article 9(3) of IP68).

## 5. Who can access your personal data

The following categories of recipients may access your personal data:

EMBL internal recipients:

EMBL Heidelberg:

International Relations

Your data may also be processed internally by other EMBL's Departments, on a strict need to know basis and when necessary for the purposes listed above (e.g. invitation to an event, feedback survey etc.). In addition, some of the data we process is provided by EMBL HR department. Note that only basic data is shared with internal departments, e.g., we will never share date of birth, photos or such like. Only the necessary information will be shared.

EMBL external recipients:

External recipient categories:

Data processors processing data on EMBL's behalf:

Data Processor 1: Access UK Limited (CRM provider).

Data Processor 2: Provider of print-mailing services, Mera Druck GmbH.

Data Processor 3: Provider of personalised mailing services, The Rocket Science Group LLC MailChimp.

Data Processor 4: Provider of survey services, SurveyMonkey Inc.

Data Processor 5: Provider of events services, Eventbrite Inc.

Data Processor 6: Provider of scheduling services, Doodle AG.

Your data will be made available to all EMBL staff and EMBL Alumni that have access to the Directory.

Location of Processor, External Recipient or International Organisation:

Alumni and EMBL staff may access the data from all over the World. The processors may process your data in the US for support purposes. Note that only basic data is shared with external third-party providers,

## 6. How long do we keep your personal data

Your personal data will be kept for the following period of time:

Retention envisaged time limits:

Personal data will be retained as long as the users use the service

Retention period rational:

Personal data will be kept until you decide to withdraw yourself from the Alumni community or we stop this service.

Data related to your time at EMBL will be kept in line with HR retention period (100 years from joining EMBL), save for: your name, the period (start and end dates of contract) and area of work at EMBL that will be kept indefinitely.

## 7. How do we protect your personal data

We have adopted the following measures to protect your personal data:

1. Risk Management & Controls: Regular risk assessments of information assets, Implementation of control measures, Periodic review of access rights
2. Training & Access: Mandatory security awareness and data protection training, Access granted based on job roles, Strict management of privileged accounts, Cryptographic key management
3. Incident Response & Recovery: Cyber security incident management process, Regular penetration testing, Disaster recovery planning, Business continuity measures
4. Compliance & Privacy: Protection of personal data in adherence with IP68 and other contractual obligations, Biometric data security, Rigorous due diligence of third party data hosting such as cloud services, Regular compliance monitoring

## 8. Data subjects' rights and oversight mechanism

Under Article 16 of the EMBL Internal Policy No 68, data subjects have the following rights:

- a right not to be subject to a decision made by automated means (i.e. without any human intervention)
- a right to request access to your personal data
- a right to request information on the reasoning underlying data processing
- a right to object to the processing of personal data
- a right to request erasure or rectification of your personal data.

When the legal basis to process personal data is consent, please note that you have the right to withdraw your consent at any time.

Please note that those rights can be subject to limitations, as described in Article 16 (2) of the EMBL Internal Policy No 68.

If you wish to exercise your rights or wish to contact the data controller regarding any other data protection related matters, you can contact us using, by sending an e-mail to: [info@embl.de](mailto:info@embl.de) or by sending a letter to: Meyerhofstraße 1 69117 Heidelberg Germany.

Advice on data protection matters can also be obtained from the EMBL Data Protection Officer (DPO), under Article 20 (2) of the EMBL Internal Policy No 68. The DPO can be reached by email at [dpo@embl.org](mailto:dpo@embl.org) or by letter at: EMBL Data Protection Officer, EMBL Heidelberg, Meyerhofstraße 1, 69117 Heidelberg, Germany.

If you wish to complain under Article 25(1) of the EMBL Internal Policy No 68, you may do so with the DPO by email at [dpo@embl.org](mailto:dpo@embl.org).

If you believe that the response of the DPO is unsatisfactory or if the DPO has failed to respond within three months from receipt of the complaint, you may complain in writing to the Data Protection Committee. It can be reached by email at [dpc@embl.org](mailto:dpc@embl.org) or by post at: EMBL Heidelberg, Data Protection Committee, Meyerhofstraße 1, 69117 Heidelberg, Germany.

Last update: 08/12/25 10:19 AM