

# Ghent University Hospital privacy statement for external stakeholders

Protection of personal data of patients' visitors, professional visitors, service providers, participants in seminars, training courses and congresses, participants in an activity, recipients of the (electronic) newsletter, job applicants etc.

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## 1 General

When you visit Ghent University Hospital as an external data subject, we may process your personal data. The main purpose of this privacy statement is to inform you why we process your personal data and what rights you can exercise.

This policy has been drawn up in implementation of EU Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data (hereinafter referred to as GDPR) and its implementing laws and decrees.

## 2 Who is the data controller of your personal data?

Ghent University Hospital, a public institution with its registered office at C. Heymanslaan 10, 9000 Ghent, Belgium and registered in the Crossroads Bank for Enterprises under number 0232.987.862 (hereinafter 'Ghent University Hospital', 'we' or 'us') is responsible for processing your personal data as an external stakeholder as described in this privacy statement.

Ghent University Hospital is part of Ghent University, a public institution with legal status in accordance with the special decree of 26 June 1991, with its place of effective management at Sint-Pietersnieuwstraat 25, 9000 Ghent, Belgium and registered in the Crossroads Bank for Enterprises under number 0248.015.142.

## 3 Data Protection Officer

If you would like any further details, please do not hesitate to contact our Data Protection Officer at [dpo@uzgent.be](mailto:dpo@uzgent.be). Also, if you feel that the hospital is not or not sufficiently respecting your rights with regard to your personal data, you can always contact the Data Protection Officer to submit a complaint.

You also have the right to submit a complaint to the Belgian Data Protection Authority, Drukpersstraat 35, 1000 Brussels, Belgium and via e-mail to [contact@apd-gba.be](mailto:contact@apd-gba.be).



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Universitair Ziekenhuis Gent  
C. Heymanslaan 10 | B 9000 Gent  
[www.uzgent.be](http://www.uzgent.be)

## 4 Basic principles and terms used in this privacy statement

We apply a number of basic principles when processing your personal data:

- We only process personal data that is necessary for the intended purpose.
- We strive to process the data accurately and correctly.
- We do not retain your data for any longer than necessary.
- We take appropriate measures to guarantee the confidentiality and integrity of your data.
- If we use external service providers, Ghent University Hospital will make sure that these processors observe the necessary data protection too.
- Data is never passed on to third parties for commercial purposes.

## 5 Definitions

For the avoidance of doubt, a selection of terms used in the privacy policy are defined below:

**Staff member(s):** employees and/or other agents of Ghent University Hospital and/or independent practitioners within Ghent University Hospital.

**Personal data:** any form of information concerning an identified or identifiable natural person, such as a patient. An identifiable person is a natural person who can be identified, directly or indirectly, in particular by reference to an identification number (e.g. the National Registry Number), name and date of birth, location data, an online identifier (e.g. an e-mail address or an IP address) or one or more factors specific to his/her physical, physiological, genetic, mental, economic, cultural or social identity.

**Consent:** any freely given, specific, informed and unambiguous expression of will by which the external stakeholder, by means of a statement or an unambiguous active act, agrees to his/her personal data being processed.

**Processor:** means a natural person or legal entity, public institution, agency or other body that processes personal data on behalf of the data controller, without being under the direct authority of the data controller.

**Processing:** any operation or set of operations that is performed on personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, protection, deletion or destruction of personal data;

**Data controller:** a natural or legal person, public institution, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data.

**Personal data legislation:** means (i) Regulation (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of Personal Data and on the free movement of such data and repealing Directive 95/46/EC as of 25 May 2018, (ii) the Belgian Act of 30 July 2018 on the protection of natural persons with regard to the processing of personal data and (iii) any other current or future applicable legislation that relates to or has an impact on privacy and the processing of personal data.

## 6 Your rights concerning the processing of your personal data

For the avoidance of any doubt, your rights with regard to your personal data are clarified in more detail below.

### 6.1 Right to information

In accordance with the provisions of the GDPR, the data subject will be informed via this policy of the processing of their data and the legal grounds for this data processing at the time of the collection of personal data of the data subject.

### 6.2 Right of access and the right to obtain a copy

You have the right to know, in accordance with the applicable legal provisions and legitimate exceptions as described above, which personal data we hold about you, what we do with it and why we do so. You also have the right to receive a copy of this information free of charge.

### 6.3 Right to rectification and completion

If you believe that Ghent University Hospital is keeping incomplete or administrative incorrect data about you, you have the right to ask us to rectify or complete this data by simple request and free of charge.

### 6.4 Right of deletion

If you are of the opinion that it is no longer necessary to keep your data, that there are no legitimate reasons to keep your data or that Ghent University Hospital is processing your data unlawfully, you may ask to have your data deleted.

For various reasons, Ghent University Hospital may be required to refuse your request for deletion. This may be the case, for example, if such data is necessary for the establishment, exercise or substantiation of a legal claim.

### 6.5 Right to withdraw your consent at any time

If the processing of personal data is based on your prior consent, you may withdraw this consent at any time. Withdrawing your consent implies that Ghent University Hospital is no longer allowed to process the data concerned.

### 6.6 Right to restriction of processing

In a limited number of cases, you may request that your personal data be kept but not processed (i.e. the processing is put on hold).

### 6.7 Right to data portability

When Ghent University Hospital processes data on the grounds of your explicit consent, or on the grounds of an agreement made with Ghent University Hospital, you, as an external stakeholder, additionally have the right to have an electronic copy of your personal data transferred to yourself or directly to another institution or person of your choice.

This transfer will be made in a structured, commonly used and machine-readable format.

## 6.8 Right to object

Insofar as the processing of your data is based only on the legitimate interests of Ghent University Hospital, you can file a reasoned objection. Ghent University Hospital will respect this reasoned objection unless it has compelling legitimate grounds that outweigh your interests, rights and freedoms or unless the data is related to the establishment, exercise or substantiation of a legal claim.

The data subject can never oppose the processing of personal data which Ghent University Hospital needs for the execution of an agreement or the fulfilment of legal obligations.

## 6.9 Right to submit a complaint to the Data Protection Authority

If you believe you have a complaint regarding the protection of privacy, you may contact the Belgian Data Protection Authority ([www.gegevensbeschermingsautoriteit.be](http://www.gegevensbeschermingsautoriteit.be)) directly at Drukpersstraat 35, 1000 Brussels, Belgium, or via +32(0)2 274 48 00 or [contact@apd-gba.be](mailto:contact@apd-gba.be).

## 7 Which personal data does Ghent University Hospital process and for which purposes?

Which of your data is processed depends on the capacity in which you come into contact with Ghent University Hospital.

Please note that there are also separate privacy policies for patients, participants in scientific research and donors, all of which you can view on our website.

The privacy policy for employees can be viewed on our intranet page.

When you visit Ghent University Hospital, the following categories of personal data are usually processed:

- identification data and financial data when using certain services offered by Ghent University Hospital:
  - parking data (bank card payment system, automatic numberplate recognition for barrier operation, enforcement in case of parking violations)
  - restaurant and shop data (bank card payment systems)
- electronic identification data through the use of cookies when visiting the website
- photographs and image recordings through the use of surveillance cameras
- successful authentications combined with the attributed IP address (Framed-IP-Address)

Below, you can find out which personal data Ghent University Hospital processes for each specific purpose, on which grounds the processing is carried out, how we process it and who we might share it with.

## 7.1 Conducting a recruitment and selection procedure and establishing a recruitment reserve in case of speculative applications

We process this personal data to guarantee the continuity and proper functioning of the hospital.

Types of personal data	Processing purposes	Legal grounds	Retention period	Recipient category
Identification data	Recruitment, selection, establishment of recruitment reserve	Necessary for the execution of the agreement with Ghent University Hospital, to which the data subject is a party, or to take measures at the request of the data subject before the conclusion of a contract	5 years after last contact in case of non-employment or 5 years after speculative application	Employees
Electronic identification data				
Contact details				
Details of occupation, employment, education, professional qualifications and training relevant to potential cooperation				

## 7.2 Website maintenance and functionality

In order to maintain and operate the Ghent University Hospital website, Ghent University Hospital uses various cookies on its website. More information can be found in our [cookie statement](#).

Type of cookies	Processing purpose(s)	Legal grounds	Retention period	Recipient category
Essential and functional cookies	Proper functioning and security of the website	Legitimate interest	<a href="#">See cookie statement</a>	No external communication
Preferential, statistical and social media cookies	Improving the browsing experience	Consent	<a href="#">See cookie statement</a>	<a href="#">See cookie statement</a>

We will notify you in advance if Ghent University Hospital intends to process the external worker's personal data for purposes other than those indicated in this privacy statement.

When Ghent University Hospital processes the above personal data for the aforementioned purposes on the legal grounds of legitimate interest, the proper functioning and security of the website are legitimate interests of Ghent University Hospital. The processing of personal data by Ghent University Hospital as referred to above with regard to personal data via cookies does not entail processing that Ghent University Hospital carries out as a public institution in the performance of its duties. After carefully weighing up the various interests, Ghent University Hospital is of the opinion that its interests outweigh those of the external worker for the aforementioned purposes. Ghent University Hospital can demonstrate that:

1. the interests it pursues through the processing can be recognised as legitimate (the '**purpose test**');;
2. the intended processing is necessary for the purposes of achieving these interests (the '**necessity test**'); and
3. the balancing of these interests against the interests, fundamental freedoms and rights of data subjects weighs in favour of the controller (the '**balancing test**').

For certain purposes as mentioned above, the external workers give their consent by explicitly agreeing to specific processing (e.g. by ticking a box indicating your preference). The external worker has the right to withdraw his/her consent at any time. The withdrawal of such consent will not affect the lawfulness of the processing based on consent before its withdrawal.

### 7.3 Communication

When you, as a visitor or third party, access **the** Wi-Fi infrastructure of Ghent University Hospital, a log is kept.

Type of personal data	Processing purpose(s)	Legal grounds	Retention period	Recipient category
Successful authentications combined with the attributed IP address	Internet access audit trail for quality control and troubleshooting	Legitimate interest	1 year	No external communication, unless the network is used illegally, the data can be passed on to the judicial authorities

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### 7.4 Physical security

Personal data category	Processing purpose(s)	Legal grounds	Retention period	Recipient category
Camera images	To protect the premises, buildings and goods that are at the disposal of Ghent University Hospital, by preventing or identifying destruction, damage and theft;	Legitimate interest	30 days	Police and judicial services in case of criminal offences according to current legislation (Article 9 of the Camera Act).
	To safeguard the health and safety of staff members by avoiding confrontation with perpetrators of theft, destruction, violence and harassment, by preserving public order and morals and by preventing nuisance;	Legitimate interest	30 days	

	To identify behaviour that is punishable under Belgian law and to provide information about such behaviour to the investigating and police services or judicial authorities for the purpose of investigation.	Legitimate interest	30 days	
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3. the balancing of these interests against the interests, fundamental freedoms and rights of data subjects weighs in favour of the controller (the '**balancing test**').

## 7.5 Business management for follow-up of works, deliveries, execution of orders

Personal data category	Processing purpose	Legal grounds	Retention period	Recipient category
Identification data of natural persons	Supply of goods and/or services by suppliers, service providers or contractors.	Necessary for the execution of the agreement with Ghent University Hospital	10 years	employees
Contact details				
Occupation-related data (company for which the agent works, professional qualifications in so far as relevant for cooperation with Ghent University Hospital, registration as a contractor at Ghent University Hospital)				

## 7.6 Visitors of patients

Personal data category	Processing purpose	Legal grounds	Retention period	Recipient category
Identification details	Use of services offered	Necessary for the execution of the agreements with Ghent University Hospital	6 months	employees
Electronic identification data				
Financial data				

Insurance details	Follow-up in case of involvement in an accident at the Ghent University Hospital campus	Legitimate interest	Until after the matter has been settled by Ghent University Hospital	Employees, insurance companies, police forces
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3. the balancing of these interests against the interests, fundamental freedoms and rights of data subjects weighs in favour of the controller (the '**balancing test**').

## 7.7 The organisation of training courses, conferences, study days and public events for professional visitors

Personal data category	Processing purpose	Legal grounds	Retention period	Recipient category
Identification details	Organisation of training courses, conferences, seminars etc.	Public interest	6 months	employees
Electronic identification data				
Event-related photos and image recordings	Information on events that have taken place	Consent	6 months	E-newsletter recipients

## 7.8 Electronic healthcare communication with the external healthcare provider via the portal for healthcare professionals

The portal for healthcare professionals allows the external healthcare provider to book consultations directly for their patient and to provide more and up-to-date information about the patient via electronic questionnaires.

Personal data category	Processing purpose	Legal grounds	Retention period	Recipient category
Electronic identification data (logging data, including National Registry Number and INAMI-number)	Verification and authentication from the healthcare provider	Legal obligation	10 years	Assigned IT employees



When UZ Gent processes the above personal data for the stated purposes on the basis of the legal obligation, this is a requirement for the use of the National Register.

## **8 How do we obtain this personal data?**

The personal data that Ghent University Hospital processes in relation to external stakeholders is obtained directly from the data subject, unless the data subject is unable to communicate this data.

## **9 Transfer of your data to a country outside the European Economic Area (EEA)**

If your data needs to be transferred to a country outside of the EEA or to an international organisation, Ghent University Hospital will ascertain whether the country of destination offers an adequate level of protection. If the country to which Ghent University Hospital wishes to transfer data does not offer adequate guarantees, Ghent University Hospital will itself enforce adequate guarantees by means of template agreements made available by the European Commission or other accepted measures.

## **10 Entry into force and changes to the privacy statement**

This privacy policy will enter into force on 29 January 2024.

Ghent University Hospital reserves the right to change its privacy policy at any time. Changes will be made by the Executive Committee of Ghent University Hospital.

You can find the latest date this privacy statement was adjusted at the top right.

The changes will be communicated on the website of Ghent University Hospital, and reference will be made to the relevant articles where such changes occur.