

Privacy Policy of Fundação Faculdade de Medicina



2023

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1. Introduction

The purpose of this document is to protect the personal data of all employees, students, and patients of the Fundação Faculdade de Medicina, ensuring privacy during the processing. This Privacy Policy has been developed to establish guidelines, in a simple and transparent manner, regarding the processing of personal data collected within the Portal of the Fundação Faculdade de Medicina, extending to all.

This Privacy Policy will be governed, interpreted, and enforced in accordance with Law nº 13,709/2018, the General Data Protection Law (LGPD), and other supplementary norms to the legislation.

2. Data Protection Officer (DPO)

If the user needs to request assistance, seek clarification, address questions, or express concerns regarding the processing of their personal data, the Fundação Faculdade de Medicina will promptly be available. Requests for information can be obtained by contacting the responsible party mentioned below.

Contact Information

- DPO: Rodrigo Silva;
- E-mail: rodrigossr@ffm.br
- Tel.: +55 (11) 3016-4900
- Controller: Fundação Faculdade de Medicina;
- Address: Av. Rebouças, nº 381. Cerqueira César. CEP: 05401-000 - São Paulo/SP;
- Horário de atendimento: Segunda à sexta-feira, das 9h às 16h (Horário Comercial).

Requests related to the processing of personal data will be addressed within 15 (fifteen) days from the date of the request, always striving to provide prompt assistance in the shortest possible time.

3. Definitions and Concepts

In order to facilitate understanding regarding the processing of personal data, some fundamental definitions that constitute this Privacy Policy are presented:

a) Anonymization: “use of reasonable and available technical means at the time of processing, through which data loses the possibility of association, either directly or indirectly, with an individual”. (art. 5º, XI of LGPD);

b) Storage: “Action or result of keeping or preserving data in a repository” (Item 1.1 of the Good Practices Guide of the LGPD);

c) Collection: “data collection with specific purpose” (item 3.1 the Good Practices Guide of the LGPD);

d) Consent: “Free, informed, and unequivocal expression by which the data subject agrees to the processing of their personal data for a specific purpose.” (Art. 5º, XII of LGPD);

e) Personal Data: “Information related to an identified or identifiable natural person” (art. 5º, I of LGPD);

f) Sensitive personal data: “Personal data on racial or ethnic origin, religious belief, political opinion, membership in a union or organization of a religious, philosophical, or political nature, data related to health or sexual life, genetic or biometric data, when linked to a natural person.” (art. 5º, II of LGPD);

g) Anonymized data: “data relating to an data subject who cannot be identified, considering the use of technical means available of the time of the processed thereof” (art. 5º, XI da LGPD);

h) Deletion: “Exclusion of data or set of data stored in a database, regardless of the procedure employed” (art. 5º, VIII of LGPD);

i) DPO: “Person appointed by the controller and processor to act as a communication channel between the controller, data subjects, and the National Data Protection Authority (ANPD)” (art. 5º, VIII of LGPD);

j) Purpose: “Processing for legitimate, specific, explicit, and informed purposes to the data subject, with no possibility of subsequent processing that is incompatible with these purposes.” (art. 6º, I of LGPD);

k) LGPD: General Data Protection Law.

l) Data Subject: “Natural person to whom the personal data being processed refers” (art. 5º, V of LGPD);

m) Processing of Personal Data: “Any operation performed with personal data, including those related to collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, elimination, assessment, or control of information, modification, communication, transfer, dissemination, or extraction” (art. 5º, X of LGPD);

n) Retention: "Archiving or storing personal data, regardless of the means used (paper document, electronic document, database, steel file, etc.)" (Item 3.1 of the Good Practices Guide of the LGPD).

4. Rights of the Data Subject

The LGPD establishes a legal framework that guarantees data subjects rights to be exercised against data controllers. In accordance with Article 18 of the LGPD, the Fundação Faculdade de Medicina respects and ensures access to personal data by the data subject upon request, providing the opportunity to provide information about:

- a)** Confirmation of the existence of the processing of the data subject's personal data by the Fundação Faculdade de Medicina;
- b)** Access to the data subject's personal data;
- c)** Correction of personal data that is incomplete, inaccurate, or outdated;
- d)** Anonymization, blocking, or elimination of personal data that is unnecessary, excessive, or processed in violation of the provisions of the LGPD;
- e)** Portability of personal data to another service or product provider, in accordance with the regulations of the National Data Protection Authority (ANPD), while respecting the trade secrets and industrial secrets of the Fundação Faculdade de Medicina;
- f)** Deletion of personal data processed with the consent of the data subject, except in cases of personal data retention provided for in the LGPD;
- g)** Information about public and private entities with which the Fundação Faculdade de Medicina has shared data;
- h)** Opposition to processing that violates the LGPD; and;
- i)** Revocation of consent.

The rights listed above can be exercised by contacting the Fundação Faculdade de Medicina through the channels provided in the section 'Data Controller,' for all matters related to the processing of personal data. There is a possibility of requesting information to verify the authenticity of the data subject by the Fundação Faculdade de Medicina.

It is reiterated that the Fundação Faculdade de Medicina is committed to addressing all requests made by the data subject in the shortest possible and reasonable time, with a maximum response time of 15 (fifteen) days from the date of the request.

5. Sharing of Personal Data

In principle, personal data will not be shared with third parties external to the Fundação Faculdade de Medicina.

However, the Fundação Faculdade de Medicina collaborates with the Hospital das Clínicas da Faculdade de Medicina da Universidade de São Paulo. Therefore, when there is a need to share the collected personal data, the stated purpose will be ensured and respected, along with the necessary transparency of information.

6. Storage of Personal Data

The Fundação Faculdade de Medicina employs all necessary means, such as technical and organizational measures, to prevent unauthorized access and use and to protect the integrity, confidentiality, and availability of the collected personal data.

Furthermore, the Fundação Faculdade de Medicina retains the personal data provided by its employees, students, and patients only for as long as they are useful for the purposes for which they were collected or until the data subject requests the deletion of this personal data. However, compliance with the data subject's request for deletion will respect the legally defined minimum storage period, where applicable.

The criteria used to determine the period for which data will be retained include primarily:

- Until the specific purpose of the collection of personal data expires;
- As long as the demand or the statutory limitation period/deadline persists in law, in defense of their rights or the rights of the Fundação Faculdade de Medicina;
- Regarding cookies, data will be retained as long as necessary to achieve the purposes, following the provisions of the Cookie Policy of the Fundação Faculdade de Medicina, available in the Transparency section of the website
- Until requests, complaints, or suggestions presented are addressed, the collected personal data will be maintained.

7. Collected Data and Their Purposes

The personal data collected by the Fundação Faculdade de Medicina will be strictly necessary for the fulfillment of the specific proposed purpose. In cases where the collection of health data is necessary, the Fundação Faculdade de Medicina will employ even more rigorous mechanisms and security measures to ensure the safety of this information.

The collection of personal data by the Fundação Faculdade de Medicina occurs at the moment the data subject provides their data for hiring, enrollment, or medical care, including:

| Method of Collection of Personal Data | Personal Data | Purpose of use of Personal Data | Legal Basis |
|---|---|--|--|
| Personal Data collected on "Fale Conosco" | Personal Identification Data Contact Information | Identify the user who requested contact to respond to user information request Establishing contact for the handling of commercial inquiries and addressing potential related questions | When necessary to meet the legitimate interests of the data controller or a third party |
| Personal Data collected during website navigation | Digital Personal Data | Identifying user browsing preferences Evaluating navigability and published content Statistical and security purposes | Data Subject When necessary to meet the legitimate interests of the data controller or a third party |
| Personal Data collected through the "Whistleblower Channel" | Identification Data Contact Information | Identifying the whistleblower to address and respond to the reported complaint | Fulfillment of Legal or Regulatory Obligations; When necessary to meet the legitimate interests of the data controller or a third party |
| Personal Data collected on "Fale Conosco" | Personal Identification Data Contact Information Professional Personal Data | Identifying the candidate interested in job vacancies provided by the Fundação Faculdade de Medicina Registering the candidate's resume for the desired position | When necessary to meet the legitimate interests of the data controller or a third party |

| | | | |
|---|--|--|---|
| <p>Personal Data collected on "Cadastro Jornal"</p> | <p>Personal Identification Data Contact Information</p> | <p>FFM Newspaper Subscription User identification and registration for receiving the FFM Newspaper via email Delivery of the FFM Newspaper</p> | <p>Collection of consent from data subject When necessary to meet the legitimate interests of the data controller or a third party</p> |
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8. Web Browsing and Cookies

For more information about personal data collected through cookies used on the website of the Fundação Faculdade de Medicina, it is suggested to read the Cookie Policy, available in the Transparency section of the website.

9. Responsibility

The responsibilities of the data processing agents of the Fundação Faculdade de Medicina are defined according to the LGPD. Among the responsibilities of the agents are:

- **General Responsibility** – Both the data controller and the processor must use personal data in a responsible, professional, ethical, and legal manner, respecting the rights and privacy of data subjects. Moreover, they are accountable for damages resulting from data breaches by failing to adopt the security measures, technical and administrative, as outlined in Article 46 of Law 13,709/2018;

- **Data Protection Officer (DPO)** - Receiving communications from the responsible Authority, accepting complaints and communications from data subjects, providing explanations and taking actions, guiding on practices related to the protection of personal data, and performing other duties determined by the data controller or established in complementary regulations.

The Fundação Faculdade de Medicina is committed to safeguarding the security and protection of the personal data collected from its employees, researchers, professionals, patients, and other data subjects.

Therefore, anyone from the Fundação Faculdade de Medicina involved in the processing of personal data undergoes continuous training to ensure information security at all stages and even after the completion of the processing.

10. Updates and Revisions to the Privacy Policy

The Fundação Faculdade de Medicina reserves the right to review and update this Privacy Policy whenever necessary to protect the privacy of employees, students, and patients. Therefore, it is essential to periodically review this Policy.

Any and all updates will take effect from the publication date disclosed in the item below.

11. General Provisions

If there are any doubts, requests, or suggestions regarding the processing of personal data carried out by the Fundação Faculdade de Medicina, the user should contact the available customer service channels in the section "Data Controlle".

Last updated: 10/11/2022