

# **PRIVACY POLICY**

## **OF THE MONACO CARDIO-THORACIC CENTER**

*Version dated January 29, 2026*

### **Data controller:**

The Monaco Cardiothoracic Centre (hereinafter referred to as CCM), located at 11 bis avenue d'Ostende, 98000 Monaco, processes your personal data as data controller and undertakes to ensure its protection, confidentiality, and security in accordance with the legislation in force in the Principality of Monaco (Law No. 1.565 of December 3, 2024, on the protection of personal data).

The purpose of this Privacy Policy is to explain why your personal data is collected and processed, what rights you have over your data, and how you can exercise those rights.

The CCM reserves the right to modify this Privacy Policy at any time. Any changes will take effect immediately and will be updated accordingly.

### **Purposes of processing:**

The collection of certain personal data is necessary to fulfill the following purposes:

- Website management
- Responding to contact requests made on the website
- Recruitment management
- Supplier and partner management
- Email management
- Video surveillance and building security management
- Management of events open to the public
- Management of requests to exercise your personal data rights

The CCM collects personal data for specific, explicit, and legitimate purposes, and does not process any of your data for purposes incompatible with those for which it was collected, unless you have given your prior consent.

### **Legal basis:**

The CCM collects personal data on the following legal bases:

- ✓ Legitimate interest; in particular for the processing of website management, responding to contact requests made on the website, email management, video surveillance management, and management of events open to the public.  
The collection of certain data is necessary for the purposes for which it is processed, for example when responding to data subjects, communicating online, by email or by post, or promoting the activities of the Monaco Cardiothoracic Centre.  
In order to ensure the safety of property and people, the CCM is equipped with video surveillance cameras in public reception areas.
- ✓ Performance of a contract or pre-contractual measures; Your data is necessary for the performance of the contract you have entered into or wish to enter into, or for the performance of pre-contractual measures. This concerns the processing of recruitment management, Supplier and partner management.

- ✓ Compliance with a legal obligation; in the context of managing requests to exercise your personal data rights, your data is processed by the CCM to meet its legal obligations.
- ✓ Obtaining consent, if applicable, for one or more specific purposes of the data subject.

### **Categories of personal data:**

The CCM collects various types of personal data, mainly provided directly via contact forms or emails:

- Identity and family status (surname(s), first name(s), etc.)
- Addresses and contact details
- Education, qualifications, professional background (resume)
- Electronic identification data (email address, etc.)
- Images

The CCM collects only the data that is strictly necessary for the purpose for which it is processed, in accordance with the principle of data minimization.

### **Retention periods:**

Your data is kept by the CCM for the time necessary to achieve the purposes set out above, in accordance with the legal retention periods in force, the legal limitation periods, and the recommendations of the APDP (Monaco) and the European authorities.

### **Mandatory or optional nature of responses:**

Depending on the processing carried out, your responses may be mandatory in order for us to process your request and/or inquiries. If you do not provide your data, in particular your email address in the contact form, we will not be able to fulfill your request.

In the specific context of the contact form, mandatory data is indicated by an asterisk.

### **Recipients or categories of recipients:**

The transmission of your data may be necessary in order to carry out the processing for which it is collected. Depending on the purpose, the data may be transmitted to internal departments that need to know it, or to event service providers, or to the Labor Department, the Public Security Department, or any other authorized authority.

### **Data security:**

When the CCM collects personal data, enhanced technical, physical, and organizational security measures are applied to ensure the security and confidentiality of your data.

Access, storage, and hosting of data are protected and controlled, and regular backups are performed.

The CCM is committed to integrating personal data protection from the design stage of any project, service, or other tool related to the handling of personal data, including limiting the purposes of data collection, minimizing personal data, security, and respect for data integrity and confidentiality.

In the event of a personal data breach, i.e. a security incident that compromises the integrity, confidentiality, or availability of your personal data, the CCM is committed to assessing the risk and recording any breach in a register. If the risk is considered high, you will be informed as soon as possible.

### **Rights regarding personal data:**

In accordance with current legislation, you have the right to access, rectify, erase, restrict, and transfer your data. You also have the right to object to the processing of your personal data.

- **Right of access:** You have the right to obtain confirmation that your data is or is not being processed and, when it is, to obtain access to the information held by the CCM.
- **Right to object:** You have the right to object to your data being used for a specific purpose. You must then provide reasons relating to your particular situation.
- **Right to rectification:** You have the right to obtain, as soon as possible, the rectification of any data concerning you that is inaccurate or erroneous. You may also request that your data be completed, if necessary.
- **Right to erasure:** Except in cases where there are legal exceptions, you may ask the CCM to erase your data, particularly if you believe that the processing is no longer necessary for the purposes for which your data was collected. However, the CCM may have legitimate reasons for retaining such data.
- **Right to restrict the processing of your data:** You may ask the CCM to temporarily freeze the use of some of your data, i.e., to store it without being able to use it. This right applies, for example, when you contest the accuracy of the data used, when you object to the processing of your data, or when you need it for the establishment, exercise, or defense of legal claims.
- **The right to portability:** In certain cases, you have the option of retrieving some of your data in a structured format, or asking the CCM to transfer it to another organization, where technically possible. This right only applies to data that you have actively and consciously provided (for example, data that you have entered in an online form), or data processed on the basis of consent or the performance of a contract, and which is processed automatically.
- **The right to lodge a complaint with the supervisory authority:** You have the right to contact the APDP (Autorité de Protection des Données Personnelles) - Monaco's supervisory authority - to lodge a complaint, either directly on the APDP website or by post.

### **Rights exercise:**

To exercise your rights regarding your personal data, you can contact the CCM's data protection officer:

- By email at: [dpo@ccm.mc](mailto:dpo@ccm.mc)
- Or by post: Data Protection Officer  
Monaco Cardiothoracic Centre  
11 bis avenue d'Ostende  
98000 MONACO

All requests must specify the reason for the request (exercise of the right of access, opposition, etc.) and the address to which the response should be sent. Proof of identity may be requested.

The CCM will send you its response within a maximum of one month from the date of receipt of your request.

**Profiling:**

No personal data is used for automated decision-making or profiling purposes.

**Transfer:**

No transfers are made outside the Principality of Monaco to third parties or to countries that do not offer adequate protection. If a transfer were to be made, it would be carried out in accordance with the legal requirements.

**Third-party source of personal data:**

As part of the recruitment management process, the CCM may receive data that it has not collected itself from the data subject. This is the case for information provided by a recruitment agency (resumes, etc.).

**Cookie Policy and Website Use:**

A cookie (or tracker) is a small text file placed by a server on a user's device when they browse a website. The device may be a computer, smartphone, or tablet.

A cookie is associated with a domain name, i.e. the website address, for example: [ccm.mc](http://ccm.mc). It is used to collect browsing information about each visitor to the website.

There are different types of cookies:

- **Technical cookies** necessary for the proper functioning of the site cannot be disabled. They are exempt from consent. The data collected by these cookies is stored for the duration of the session.
- **Audience measurement cookies** allow us to understand how visitors access the website and obtain statistics on their browsing behavior. Consent is requested; it can be “accepted” or “refused.”

All cookies are visible to the user via the “Voir les préférences” (French) or “View preferences” button. Refusing cookies does not have any negative consequences on the user's browsing experience. This data does not allow you to be directly identified. No personal data is stored and no statistical data is cross-referenced with data held elsewhere by the CCM.

Matomo Analytics uses these cookies to help the website analyze user browsing. Matomo complies with the General Data Protection Regulation (GDPR) and the data is stored in the European Union.