

Data Protection Policy

1 Aim and purpose

The purpose of this Data Protection Policy is to protect the personality and fundamental rights of employees, patients, customers, job applicants, business partners, organizations collaborating with SAKK and suppliers within the Swiss Group for Clinical Cancer Research (hereinafter referred to as "SAKK") about whom personal data is processed.

2 Legal basis

This Data Protection Policy is based on the following legal bases:

- The Federal Act on Data Protection (FADP) and the Ordinance to the Federal Act on Data Protection (FADP);
- Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data, on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation; GDPR), if applicable.

3 Data protection objectives

3.1 Protection of personality

- a. The main objective of data protection is to protect the personality against unlawful or disproportionate processing of personal data.
- b. The following three sub-objectives can be derived from this main objective:
 - Restrictive processing of personal data from a data protection point of view;
 - Transparency and controllability of personal data for internal and external control bodies;
 - Transparency and controllability of personal data for the data subjects.

3.2 Uniform data protection level

Within the SAKK, a uniform level of data protection is maintained when processing personal data and the following objectives are thus pursued:

- Personal data is processed transparently and comprehensibly and only in compliance with the relevant legal regulations.
- Image damage due to data protection incidents is prevented.
- Violations of the relevant data protection regulations are avoided.
- The agreements / contracts with contract partners regarding data protection are permanently respected within all services offered by SAKK.
- All employees are aware of their duties with regard to data protection. SAKK strives to make sites, customers, job applicants, business partners, organizations collaborating with SAKK and suppliers aware of their own responsibility with regard to data protection and to oblige them to comply with all data protection requirements.

3.3 Data security

The SAKK takes all necessary precautions to protect personal data against unauthorized processing through appropriate technical and organizational measures.

4 Data protection responsibility

Details regarding data protection responsibilities are defined in our standard operation procedure for data protection.

This Data Protection Policy and the documents derived from it are followed throughout the SAKK.

This Data Protection Policy was accepted by the General Assembly of SAKK on 22.11.2023 and is effective as of that date.

Basel, 22.11.2023

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