

PRIVACY STATEMENT

Information on the processing of data in connection with the MRCT Registry according to Art 12 to 14 GDPR.

Controller

The controller responsible for the processing of personal data within the meaning of Art 4(7) GDPR in connection with the MRCT Registry (www.mrct-registry.org), which is operated by the society, is:

European Society of Cardiovascular Radiology (ESCR), registered association (ZVR 658533648)
Am Gestade 1
1010 Vienna
AUSTRIA
Phone: +43 1 5334064909
Email: dataprotection@escr.org

Data Protection Officer

ESCR has not appointed a Data Protection Officer, as it is not obliged to do so under Art 37 GDPR. Data protection enquiries may be addressed to dataprotection@escr.org.

Personal Data

ESCR processes the following categories of personal data:

REGISTRY INSTITUTES AND RESPONSIBLE PERSONS

- personal information about Institute Director/Responsible Person: title, first name, last name, email, phone
- personal information about local registry master: title, full name, email, phone
- address
- type of institute
- institute name
- institute data: number of residents, number of consultants, number of MR-scanners, number of CT-scanners
- information about the Cardiac Cath Lab and Nuclear Medicine Department
- available CT-Scanners for Registry
- available MR-Scanners for Registry

PHYSICIANS

- title
- first name
- last name
- telephone and fax numbers
- country
- email addresses
- institute information
- URL
- position
- certificates
- certification level

RADIOLOGIC TECHNOLOGISTS / STUDY NURSES

- full name
- telephone and fax numbers
- country
- email addresses
- institute information

USERS OF THE REGISTRY PLATFORM

- user account data (username, password in encrypted form, login history)
- technical data (IP address, date and time of access, log files)

Case Data

Cases submitted to the MRCT Registry by participating institutes are fully anonymised by the submitting institute prior to upload and do not contain any information that allows the identification of patients. Such anonymised data do not constitute personal data within the meaning of the GDPR (Recital 26 GDPR). ESCR does not process any patient-related personal data. The submitting institute is responsible for ensuring that cases are anonymised before submission.

Purposes and Legal Basis

ESCR processes personal data in connection with the MRCT Registry for the following purposes and on the following legal bases:

- (a) registration and administration of participating institutes and user accounts, provision of access to the Registry platform and communication regarding the Registry – Art 6(1)(b) GDPR (performance of the participation agreement or steps prior to entering into it);
- (b) verification and documentation of certificates and certification levels of participating physicians – Art 6(1)(b) GDPR;
- (c) creation of statistics and scientific publications by ESCR based on anonymised case data – Art 6(1)(f) GDPR; the legitimate interest lies in the scientific evaluation and advancement of cardiovascular imaging. Statistics and publications do not identify individual physicians or staff members [unless the data subject has consented to being named, e.g. as contributor or co-author – Art 6(1)(a) GDPR];
- (d) information on Registry events and other ESCR services – Art 6(1)(f) GDPR; the legitimate interest lies in promoting the Registry and its scientific purpose. Where electronic communications for direct marketing require prior consent under § 174 of the Austrian Telecommunications Act 2021 (TKG 2021), such communications are sent only on the basis of consent – Art 6(1)(a) GDPR;
- (e) compliance with statutory retention obligations, in particular under tax law – Art 6(1)(c) GDPR;
- (f) establishment, exercise or defence of legal claims – Art 6(1)(f) GDPR; the legitimate interest lies in the protection of ESCR's legal position.

Categories of Recipients

ESCR discloses personal data only where this is necessary for the purposes stated above and permitted by a legal basis, and only to the extent necessary ("data minimisation").

The data processed by the controller may be disclosed to the following categories of recipients, where necessary for the purposes stated above:

- processors engaged by ESCR (in particular IT service providers operating and hosting the Registry platform), bound by a data processing agreement pursuant to Art 28 GDPR
- officers and committee members of the society entrusted with the administration of the MRCT Registry
- scientific co-operation partners of ESCR, only on the basis of the data subject's consent or in anonymised form
- tax advisors, auditors and legal advisors, who are bound by professional secrecy
- courts and public authorities, where required by law

Storage Period

ESCR shall not store personal data longer than required for the respective purpose of processing. Personal data are stored for the duration of the participation in the MRCT Registry and deleted within 3 months after the end of the participation or the deletion of the user account, unless longer retention is required or permitted by law. Data used for statistics and publications are anonymised as soon as the purpose permits. Reasons justifying a storage of personal data beyond the duration of the participation are storage obligations subject to tax law (generally seven years from the end of the calendar year the data processing relates to, § 132 Austrian Federal Fiscal Code – BAO) or the establishment, exercise or defence of legal claims, which may justify retention for up to 30 years in accordance with Austrian regulations on the statute of limitation (§ 1478 ABGB).

In the event the storage of personal data is based exclusively on the data subject's consent, such consent can be withdrawn at any time. Upon withdrawal, the data subject may request the erasure of the data, unless there is another legal basis for their further storage.

Sources of Personal Data

ESCR processes personal data provided by the data subject. Personal data of local registry masters, physicians, radiologic technologists and study nurses may also be provided by the Institute Director/Responsible Person of the participating institute when registering the institute. Information on certificates may be obtained from the issuing bodies (e.g. ESCR certification). The registering institute shall inform the persons concerned accordingly and provide them with this Privacy Statement.

Obligation to Provide Personal Data

The provision of the personal data marked as mandatory in the registration form is necessary for participation in the MRCT Registry. If these data are not provided, participation in the Registry is not possible. There is no statutory obligation to provide personal data.

Third Countries and International Organisations

ESCR processes personal data within the European Union/European Economic Area. Where service providers located outside the EU/EEA are engaged, transfers are based on an adequacy decision of the European Commission (Art 45 GDPR), including the EU-U.S. Data Privacy Framework where the recipient is certified, or on the EU Standard Contractual Clauses (Art 46(2)(c) GDPR).

Personal data may be transferred to international health organisations only in individual cases. Such transfers take place only where (i) an adequacy decision pursuant to Art 45 GDPR exists, (ii) appropriate safeguards pursuant to Art 46 GDPR have been provided, or (iii) a derogation pursuant to Art 49 GDPR applies, in particular the data subject's explicit consent (Art 49(1)(a) GDPR). A copy of the applicable safeguards may be obtained by contacting dataprotection@escr.org.

Automated Decision-making

ESCR does not use personal data for automated decision-making, including profiling, within the meaning of Art 22 GDPR.

Rights of the Data Subject

Every data subject has the right of access (Art 15 GDPR), rectification (Art 16 GDPR), erasure (Art 17 GDPR), restriction of processing (Art 18 GDPR), data portability (Art 20 GDPR) and objection (Art 21 GDPR). Where processing is based on consent, the data subject may withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal (Art 7(3) GDPR). In order to exercise these rights, data subjects should contact the controller at dataprotection@escr.org. In the event the data subject is of the opinion that the processing of the data subject's personal data infringes data protection law or the data subject's right to privacy, the data subject may lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement. In Austria, the competent authority is the Austrian Data Protection Authority (Datenschutzbehörde), Barichgasse 40–42, 1030 Vienna, www.dsb.gv.at.

In the event a data subject has given consent for the processing of his or her personal data for a specific purpose and such data were also processed subject to another legal basis, for example for the performance of a contract or for the establishment, exercise or defence of legal claims, the data subject's withdrawal of the consent to process such data does not affect the processing of such data subject to another legal basis.

Right to Object

Where ESCR processes personal data on the basis of legitimate interests (Art 6(1)(f) GDPR), the data subject has the right to object at any time, on grounds relating to his or her particular situation, to such processing (Art 21(1) GDPR). Where personal data are processed for direct marketing purposes, the data subject has the right to object at any time to such processing, without having to state any reasons; in this case the data will no longer be processed for such purposes (Art 21(2) and (3) GDPR). The objection may be sent to dataprotection@escr.org.

Version 2, as of September 29, 2026