

## **SR21- Institute for Scientific Research, Zurich Privacy and Data Protection Policy**

### **1. Definitions**

1.1 “Institute” means SR21- Institute for Scientific Research.

1.2 “Personal Data” means any information relating to an identified or identifiable natural person.

1.3 “Processing” means any operation performed on personal data including collection, storage, use, or disclosure.

1.4 “Data Subject” means the individual to whom personal data relates.

### **2. Scope and Application**

2.1 This Policy applies to all processing of personal data by SR21- Institute for Scientific Research.

2.2 It applies to all personnel, contractors, and affiliated parties acting on behalf of the Institute.

### **3. Legal Basis and Compliance**

3.1 SR21 Institute for Scientific Research processes personal data in compliance with applicable legislation including the Swiss Federal Act on Data Protection (FADP), the EU General Data Protection Regulation (GDPR), and the UK Data Protection Act 2018.

3.2 Where multiple legal regimes apply, the highest standard of protection shall be adopted.

### **4. Data Protection Principles**

4.1 Personal data shall be processed lawfully, fairly, and transparently.

4.2 Data shall be collected for specified and legitimate purposes.

4.3 Data shall be adequate, relevant, and limited to what is necessary.

4.4 Data shall be accurate and kept up to date.

© 2026 SR21-Institute for Scientific Research, Inc. All rights reserved. Registration or use of this site constitutes acceptance of our Terms of Conditions policy and Data Protection / Privacy policy

4.5 Data shall not be retained longer than necessary.

4.6 Appropriate security measures shall be implemented.

4.7 Compliance shall always be demonstrable.

## **5. Categories of Data**

5.1 Identification and contact data.

5.2 Academic and professional records.

5.3 Administrative and transactional records.

5.4 Technical and digital interaction data.

5.5 Communications and correspondence records.

## **6. Lawful Processing Grounds**

6.1 Processing shall be based on contractual necessity, legal obligation, legitimate interests, or consent.

6.2 Consent shall be obtained explicitly where required and may be withdrawn at any time.

## **7. Data Use**

7.1 Administration of programmes and research activities.

7.2 Management of fellowships and institutional relationships.

7.3 Organisation of events and conferences.

7.4 Compliance, risk management, and institutional development.

## **8. Data Sharing**

8.1 Personal data shall not be sold.

8.2 Data may be shared with trusted service providers, partners, and authorities where legally required.

8.3 All third-party processing shall be governed by contractual safeguards.

© 2026 SR21-Institute for Scientific Research, Inc. All rights reserved. Registration or use of this site constitutes acceptance of our Terms of Conditions policy and Data Protection / Privacy policy

## **9. International Transfers**

9.1 Transfers of personal data across jurisdictions shall be subject to appropriate safety measures.

9.2 Such safeguards shall ensure continued protection of data subject rights.

## **10. Data Retention**

10.1 Personal data shall be retained only as long as necessary for defined purposes.

10.2 Retention schedules shall be maintained and enforced.

## **11. Data Security**

11.1 SR21 Institute for Scientific Research shall implement appropriate technical and organisational measures.

11.2 Measures include access controls, encryption, monitoring, and staff confidentiality obligations.

## **12. Data Subject Rights**

12.1 Data subjects have rights including access, rectification, erasure, restriction, portability, and objection.

12.2 Requests shall be handled within legally prescribed timeframes.

## **13. Data Breach Management**

13.1 The Institute shall maintain procedures for detecting and responding to data breaches.

13.2 Relevant authorities and affected individuals shall be notified where required.

## **14. Governance and Accountability**

14.1 SR21 Institute for Scientific Research shall maintain oversight mechanisms for data protection compliance.

14.2 Regular audits, reviews, and staff training shall be conducted.

## 15. Contact Details

SR21 Institute for Scientific Research

Scheuchzerstrasse 33, 8006 Zürich, Switzerland

Website: [www.sr21.ch](http://www.sr21.ch)

Telephone: +41 43 505 16 01

---

Signature:  \_\_\_\_\_

Name: C. E. PATERAKIS

Position: Authorised Signatory DIRECTOR

Place: ZURICH, SWITZERLAND

Date of approval: 18 / 12 / 2025

Review Date: 12 / 01 / 2026