Privacy Policy
This policy was last updated on February 12, 2021.

This privacy policy ("Privacy Policy") constitutes a legally binding agreement made between you, whether personally or on behalf of an entity ("you") and Central Inspection ("we," "us", "our" or "CI"), concerning your access to and use of the covax.moph.gov.lb desktop website and mobile website (collectively, the "Platform", "IMPACT" or "Site").

CI is committed to privacy rights of the users and visitors of our services as mentioned in this Privacy Policy. The purpose of this Privacy Policy is to give you confidence as you use the Platform and to exhibit our commitment to protecting your privacy. The Privacy Policy is only applicable to the Platform's direct services and does not extend to any other website or digital service that you may access through our platforms, each of which may have their own privacy policies that differ from this one. This Privacy Policy relates solely to the online information collection and use practices of this website. We recognize that many visitors and users may be concerned about the information they provide us, and how we manage it. This Privacy Policy has been established to address those concerns.

By using the Platform and services you agree to the policies outlined in this Privacy Policy and consent to the collection, use and sharing of information you provided. If you use the Platform services on behalf of someone else, you acknowledge that you are authorized to accept this Privacy Policy on their behalf. This policy applies to you as a user of the Platform.

Please read this policy carefully so that you can understand what our policy and procedures are:

DATA COLLECTION AND USE

The Platform collects information:

a. when you visit and use the Platform;
b. when you create an account, edit your account information;

CI is privacy compliant with the requirements of the General Data Protection Regulation (GDPR).

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We will collect and process various types of personal data about you as detailed below:

- Full name
- Age/Date of Birth
- Gender
- Address
- Contact details (e.g., email address and telephone numbers)
- Identification Document number (i.e., passport number)
- Identification Document
- Occupation
- Health status information
- Internet Protocol access
- Device type and name
- Browser type and version
- Pages that are visited and time spent on the platform
- Date and time of visit
- Device operating system and version
- Telecommunication service provider

The forms on the Platform are optional and if the users choose to respond, their responses shall be registered. In some instances, choosing not to answer will affect usage of the Platform and limit access to some of its services.

If you choose to fill the forms on the Platform on behalf of someone else, you warrant that you obtained the approval from the person to do so.

We will use your personal data provided to us for the below purposes:

- To analyze entered information and classify registered individuals into groups and determine priorities in distribution and
- To organize the distribution of the vaccines on the Lebanese territory.
- To keep your data on file and store it for as long as necessary.

The Platform is optional, and if the users choose to respond, their responses shall be registered. In some instances, choosing not to answer will affect usage of the Platform and limit access to some of its services.

If you choose to fill the forms on the Platform on behalf of someone else, you warrant that you obtained the approval from the person to do so.
accordingly assess distribution of vaccine policy;
b. To organize distribution of vaccines across Lebanese territory;
c. To respond to questions and communications, which we retain in the ordinary course of business;
d. For analytical purposes, and to assist us in improving our processes, services, and products;
e. To enter into contact with users and visitors as need may be;
f. To identify you and provide you with information you are legally able to read and review;
g. To comply with any legal obligations; and
h. For any other purpose described in this Policy or the Terms of Use agreement.

DATA OWNERSHIP

The data collected through the platform is hosted by CI. Data ownership shall be transferred to the Ministry of Public Health following the signature of an agreement with CI. The agreement should be in line with applicable laws and regulations regarding data privacy and processing, most notably law 81/2018. Should ownership be transferred, this privacy policy will be updated to inform you of said change.

DATA PROCESSING

We will ensure that your personal data is processed in a manner that is compatible with the purposes indicated above.

For the stated purposes, your personal data may be disclosed to the following parties:

a. Dedicated staff within the Ministry of Public Health for the audit and processing of registries;
b. Vaccine centers who will be administering the vaccine.

dedicated consultants and staff in Siren Analytics have access to the data strictly necessary to ensure

وصول Siren Analytics إلى البيانات الضرورية لتأهيل عمل المنصة. كما وقعا اتفاقيات

للمطالبة على الأسئلة والمراسلات، التي نجمعها في إطار عملنا; للاطلاع على المعدات التي نستخدمها في تحسين أليتنا واجراءاتنا وخدماتنا ومنتجاتنا; للتوافق مع المستخدمين والزوار حسبما تدعو الحاجة; وتحديد هويتك وترويحك بمعلومات يمكنها قراءتها ومراجعتها; للوقوف على النتائج وموجبات قانونية; وكأغراض آخر ملحوظ في هذه السياسة أو في اتفاق شروط الاستخدام.
the smooth running of the platform. They have signed non-disclosure agreements with the company and Central Inspection. They are legally bound to use the data they have access to in line with applicable laws.

Data processing is carried out by automated means for the determination of your turn to receive the vaccine.

Your personal data will be processed by the Ministry of Public Health as well as the parties specified in this section under the oversight of CI, subject always to restrictions regarding confidentiality and security in line with applicable data protection laws and regulations. We will not disclose your personal data to third parties who are not authorized to process them.

Data that is not personal and that cannot be used to directly or indirectly identify you, may be shared and accessible by the public for their information and use.

RETENTION OF DATA

Retention of personal data shall be made as long as necessary for the accurate mapping of the distribution of the vaccine across the country, the management of the COVID-19 pandemic, the handling of public health concerns and to enforce legal agreements. The data is hosted on a server within Central Inspection. The data is also backed up on a server in Germany, managed by staff within Central Inspection.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of our Platform, or when legally obligated to retain this data for longer time periods.
DATA PROTECTION AND SECURITY

CI takes safeguards to protect the collected information on its secure servers and in internal communications. CI has put in place procedures and technologies as per good industry practices and in accordance with the applicable laws, to maintain security of all data from the point of collection to the point of destruction.

Although we take high measures in securing the collected information, we cannot totally guarantee its security.

ACCESSING AND MODIFYING INFORMATION

Non-personally identifiable information may be shared on the platform and may be accessible by any individual.

Personally identifiable information will only be shared with specified entities above.

You, and any of your heirs, can access the collected data and may request the data protection officer, whose details are below, to hand over the purposes, categories, source, subject and nature of the processing, identification of the persons and their categories to whom the personal data is being sent or those who can access the same, as well as the timing and purposes of such access.

You, or any of your heirs, can ask the data protection officer to correct, complete, update and erase personal data, which is incorrect, incomplete, ambiguous, expired or incompatible with the purposes of processing, or the data that are not to be processed, collected, used, saved or transferred.

You, and any of your heirs, will be required to present sufficient documentation to verify your identity to access and modify your information.
CI will notify any third-party entity that has access to the data of the amendments made at your request or any of your heirs.

CONTACT US

If you have any queries about how we use your personal data or the data we have about you, you can contact us by email or post as follows:

Central Inspection
Data Protection Officer
Baydoun building, Bordeaux Street
Verdun - Beirut
Lebanon
Email: info@cib.gov.lb