# Data Controller

Controller in terms of the GDPR and other data protection laws applicable in the member states of the European Union and other regulations with data protection character (Schengen Data Protection Act, SDSG) are:

**docdok.health AG**

Florastrasse 44

4057 Basel

Schweiz

Email: help@docdok.health

Data Protection Officer: Nils Möllers, [Keyed GmbH](https://keyed.de/)

# Privacy Policy

We welcome you on our web pages and appreciate your interest. The protection of your personal data is very important to us. Therefore, we conduct our activities in accordance with applicable personal data protection and data security legislation. Therefore, we act in accordance with the laws concerning personal data and data security. We would like to inform you below which data of your visit is used for which purpose. Should there be any further questions concerning the handling of your personal data, you are welcome to contact our data protection officer:

Nils Möllers, Keyed GmbH, [info@keyed.de](mailto:info@keyed.de), https://[www.keyed.de](http://www.keyed.de)/

### 1. What is personal data?

The concept of personal data is defined in the Bundesdatenschutzgesetz, DSG and in the GDPR. Accordingly, these are individual details about personal or material circumstances of a specific or identifiable natural person. This includes, for example, your civil name, your address, your telephone number or your date of birth.

### 2. Scope of anonymous data collection and data processing

Unless otherwise stated in the following sections, no personal data is collected, processed or used when using our websites. However, we find out through the use of analysis and tracking tools certain technical information based on the data transmitted by your browser (for example, browser type/version, operating system used, our visited websites including length of stay, previously visited website). We only evaluate this information for statistical purposes.

### 3. Legal basis for the processing of personal data

Insofar as we obtain the consent of the data subject for processing of personal data, Art. 6 para. 1 lit. a) EU General Data Protection Regulation (GDPR) serves as the legal basis for the processing of personal data.

In the processing of personal data necessary for the performance of a contract to which the data subject is a part of, art. 6 para. 1 lit. b) GDPR serves as the legal basis. This also applies to processing operations required to carry out precontractual actions.

Insofar as processing of personal data is required to fulfill a legal obligation that is subject to our company, art. 6 para. 1 lit. c) GDPR serves as the legal basis.

In the event that vital interests of the data subject or another natural person require the processing of personal data, art. 6 para. 1 lit. d) GDPR serves as the legal basis.

If processing is necessary to safeguard the legitimate interests of our company or a third party, and if the interests, fundamental rights and fundamental freedoms of the person concerned do not outweigh the former interest, art. 6 para. 1 lit. f) GDPR serves as the legal basis for processing.

### 4. Use of cookies

The websites of docdok.health use cookies. Cookies are data stored by the Internet browser on the user's computer system. The cookies can be transmitted to a page when they are accessed and thus allow an assignment of the user. Cookies help to simplify the use of websites for users. For these purposes, our legitimate interest is in the processing of personal data pursuant to art. 6 para. 1 lit. f) GDPR. In addition, we use cookies on our website that allow an analysis of users' browsing behavior.

(1) Frequency of page views

(2) Use of Website Features

It is always possible to turn off the setting of cookies by changing the option in the Internet browser. The Cookies set can be deleted. It should be noted that disabling cookies may not fully exploit all features of our website. The data of the users collected in this way are pseudonymized by technical precautions. Therefore, an assignment of the data to the calling user is no longer possible. The data will not be stored together with other personal data of the users.

When accessing our website, users are informed by an information banner about the use of cookies for analysis purposes and referred to this privacy policy. In this context, there is also an indication of how the storage of cookies in the browser settings can be prevented.

The legal basis for the processing of personal data using technically necessary cookies is article 6 (1) lit. f) GDPR. The legal basis for the processing of personal data using cookies for analysis purposes is provided after the user has consented to this art. 6 para. 1 lit. a) GDPR.

### 5. Creation of log files

Each time the website is accessed, docdok.health records data and information through an automated system. These are stored in the log files of the server. The data is also stored in the log files of our system. A storage of this data together with other personal data of the user does not take place.

The following data can be collected here:

(1) Information about the browser type and version used

(2) The operating system of the user

(3) Date and time of access

(4) Websites from which the system of the user reaches our website (referrer)

(5) Web pages accessed by the user's system through our website

# 6. Ways to contact

On the websites of docdok.health there is a contact form that can be used for electronic contact. Alternatively, contact via the provided e-mail address is possible. If the data subject contacts the controller through one of these channels, the personal data transmitted by the data subject will be automatically stored. The storage serves solely for purposes of processing or contacting the person concerned. A transfer of data to third parties does not take place. Legal basis for the processing of the data is in the presence of the consent of the user art. 6 para. 1 lit. a) GDPR.

The legal basis for the processing of the data transmitted in the course of sending an e-mail is article 6 (1) lit. f) GDPR. If the e-mail contact aims to conclude a contract, then additional legal basis for the processing is art. 6 para. 1 lit. b) GDPR.

The data will be deleted as soon as it is no longer necessary for the purpose of its collection. For the personal data from the input mask of the contact form and those sent by e-mail, this is the case when the respective conversation with the user has ended. The conversation is ended when it can be inferred from the circumstances that the relevant facts have been finally clarified.

### 7. Routine deletion and blocking of personal data

The controller will only process and store personal data of the data subject for as long as necessary to achieve the purpose of the storage. In addition, such storage may take place if provided for by the European or national legislator in EU regulations, laws or other regulations to which the person responsible for processing is subject. Our purpose are:

* To provide a great experience for your visitors and customers.
* To identify your registered members (users who registered to your site).
* To monitor and analyze the performance, operation and effectiveness of the platform.
* To ensure our platform is secure and safe to use.

As soon as the storage purpose is removed or a storage period prescribed by the aforementioned regulations expires, the personal data is routinely blocked or deleted.

### 8. Rights of the data subject

If your personal data has been processed, you are affected in the sense of the GDPR and you have the following rights to the responsible person:

### 8.1 Right of access

You may ask the person in charge to confirm if personal data concerning you is processed by us.

If such processing is available, you can request information from the person responsible about the following information:

a. the purposes for which the personal data are processed;

b. the categories of personal data that are processed;

c. the recipients or the categories of recipients to whom the personal data relating to you have been disclosed or are still being disclosed;

d. the planned duration of the storage of your personal data or criteria for determining the duration of storage if specific information is not available;

e. the existence of a right to rectification or deletion of personal data concerning you, a right to restriction of processing by the controller or a right to object to such processing;

f. the existence of a right of appeal to a supervisory authority;

g. all available information about the source of the data if the personal data are not collected from the data subject;

h. the existence of automated decision-making including profiling under article 22 (1) and (4) GDPR and - at least in these cases - meaningful information about the logic involved and the scope and intended impact of such processing on the data subject.

You have the right to request information about whether the personal data relating to you is transferred to a third country or to an international organization. In this connection, you can request the appropriate guarantees in accordance with art. 46 GDPR in connection with the transmission of information.

### 8.2 Right of rectification

You have a right to rectification and/or completion to the controller, if the processed personal data concerning you is incorrect or incomplete. The responsible person must make the correction without delay.

### 8.3 Right of restriction of processing

You may request the restriction of the processing of your personal data under the following conditions:

a. if you contest the accuracy of your personal information for a period of time that enables the controller to verify the accuracy of your personal information;

b. the processing is unlawful and you refuse to delete the personal data and instead request the restriction of the use of the personal data;

c. the controller no longer requires personal data for the purposes of processing, but you need them to assert, exercise or defend legal claims, or

d. if you objected to the processing pursuant to art. 21 (1) GDPR and have not yet determined whether the legitimate reasons of the person responsible outweighed your reasons.

If the processing of personal data concerning you has been restricted, this data – except for your storage – may only be used with your consent or for the purpose of asserting, exercising or defending legal claims or protecting the rights of another natural or legal person or for reasons of important public interest of the Union or a member State.

If the limitation of the processing under the conditions mentioned above are restricted, you will be informed by the person in charge before the restriction is lifted.

**12.4 Right of cancellation**

**12.4.1** You may require the controller to delete your personal information without delay, and the controller shall promptly delete that information if any of the following is true:

a. Your personal data is no longer necessary for the purposes for which it was collected or otherwise processed.

b. You revoke your consent to the processing pursuant to art. 6 para. 1 lit. a or Art. 9 para. 2 lit. a GDPR and there is no other legal basis for processing.

c. Pursuant to art. 21 para. 1 GDPR you give objection to the processing and there are no prior justifiable reasons for the processing, or pursuant to art. 21 (2) GDPR you give objection to the processing.

d. Your personal data has been processed unlawfully.

e. The deletion of personal data concerning you is required to fulfill a legal obligation under Union law or the law of the member States to which the controller is subject.

f. The personal data concerning you was collected in relation to information society services offered pursuant to art. 8 para. 1 GDPR.

**12.4.2** If the person in charge has made the personal data concerning you public and pursuant to article 17 (1) of the GDPR is required to delete it, is taking due account of the technology available and the costs of implementation, including appropriate technical measures, to inform data controllers who process the personal data that you have requested the deletion of any links to such personal data or copies or replications of such personal data.

**12.4.3** The right to deletion does not exist if the processing is necessary

a. to exercise the right to freedom of expression and information;

b. to fulfill a legal obligation required by the law of the Union or of the member States to which the controller is subject, or to perform a task of public interest or in the exercise of official authority conferred on the controller;

c. for reasons of public interest in the field of public health pursuant to art. 9 (2) lit. h and i and art. 9 (3) GDPR;

d. for archival purposes of public interest, scientific or historical research purposes or for statistical purposes pursuant to article 89 (1) of the GDPR, in so far as the law referred to in paragraph 1 is likely to render impossible or seriously affect the achievement of the objectives of that processing, or

e. to assert, exercise or defend legal claims.

### 8.5 Right of information

If you have the right of rectification, erasure or restriction of processing to the controller, he/she is obliged to notify all recipients to whom your personal data has been disclosed of this correction or deletion of the data or restriction of processing, unless: this proves to be impossible or involves a disproportionate effort.

You have a right to the person responsible to be informed about these recipients.

### 8.6 Right of Data Portability

You have the right to receive the personal information that you provide to the controller in a structured, common and machine-readable format. You also have the right to transfer this data to another person without hindrance by the person responsible for providing the personal data, provided that

a. the processing on a consent acc. art. 6 para. 1 lit. a GDPR or art. 9 para. 2 lit. a GDPR or on a contract acc. art. 6 para. 1 lit. b GDPR is based and

b. the processing is done by automated means.

In exercising this right, you also have the right to obtain the personal data concerning you directly from one person responsible to another person responsible, as far as technically feasible. Freedoms and rights of other persons may not be affected.

The right to data portability does not apply to the processing of personal data necessary for the performance of a task in the public interest or in the exercise of official authority delegated to the controller.

### 8.7 Right to object

You have the right at any time, for reasons that arise from your particular situation, to object against the processing of your personal data, which pursuant to art. 6 para. 1 lit. e or f GDPR takes place; this also applies to profiling based on these provisions.

The controller will no longer process the personal data concerning you unless he can demonstrate compelling legitimate reasons for processing that outweigh your interests, rights and freedoms, or the processing is intended to assert, exercise or defend legal claims.

If the personal data relating to you is processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for the purpose of such advertising; this also applies to profiling insofar as it is associated with such direct advertising.

If you object to processing for direct marketing purposes, your personal data will no longer be processed for these purposes.

Regardless of directive 2002/58/EC, you have the option, in the context of the use of information society services, of exercising your right to object through automated procedures that use technical specifications.

### 8.8 Right to revoke the data protection consent declaration

You have the right to revoke your data protection consent declaration at any time. The revocation of consent does not affect the legality of the processing carried out on the basis of the consent until the revocation.

### 8.9 Automated decision on a case-by-case basis, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which has a legal effect on you or, in a similar manner, significantly affects it. This does not apply if the decision

a. is required for the conclusion or performance of a contract between you and the controller,

b. is permissible on the basis of Union or member State legislation to which the controller is subject, and that legislation contains appropriate measures to safeguard your rights and freedoms and your legitimate interests, or

c. with your express consent.

However, these decisions must not be based on special categories of personal data pursuant to art. 9 (1) GDPR, unless art. 9 (2) lit. a or g and reasonable procedures have been taken to protect the rights and freedoms and your legitimate interests.

Regarding the cases mentioned in a. and c., the person responsible shall take reasonable steps to safeguard the rights and freedoms and your legitimate interests, including at least the right to obtain the intervention of a person by the controller, to express his or her own position and to contest the decision.

### 8.10 Right to complain to a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to complain to a supervisory authority, in particular in the member State of its place of residence, employment or the place of the alleged infringement, if you believe that the processing of your personal data violates against GDPR.

The supervisory authority to which the complaint has been submitted shall inform the complainant of the status and results of the complaint, including the possibility of a judicial remedy under article 78 of the GDPR.

### 9. Google Fonts

Description and purpose

This site uses so-called Google fonts, which are distributed by Google LLC (Google), for the uniform display of fonts. When you call up a page, your browser loads the required web fonts in your browser cache to display texts and fonts correctly. For this purpose, the browser you use must connect to the servers of Google LLC (Google). This enables Google LLC (Google) to know that our website has been accessed via your IP address. The use of Google Fonts is in the interest of a uniform and attractive presentation of our online offers.

Legal Basis

The legal basis is Art.6 para. 1 lit. f) GDPR.

Receiver

The data is usually transferred to a Google server in the USA and stored there.

Transfer to third Countries

The IP address is transmitted to the already mentioned provider and stored.

Duration  
The data will be deleted as soon as they are no longer necessary for the purpose for which they were collected. In addition, the data will be deleted if you revoke your consent or request the deletion of your personal data.

Possibility of appeal

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) to Google and the processing of this data by Google by downloading and installing the browser add-on. Opt-out cookies prevent the future collection of your data when visiting this website. To prevent Universal Analytics from collecting data across multiple devices, you must opt-out on all systems in use.

### Contractual or legal obligation

### There is no contractual or legal obligation to provide the data.

### Further data protection information via link

### https://policies.google.com/?hl=de&gl=del

### <https://policies.google.com/privacy?hl=de&gl=de>

### 10. Integration of other services and content of third parties

It may happen that content from third parties, such as videos from YouTube, maps from Google Maps, RSS feeds or graphics from other websites are included in this online offer. This always presupposes that the providers of this content (hereinafter referred to as "third party provider") perceive the IP address of the users. Because without the IP address, they could not send the content to the browser of the respective user. The IP address is therefore required for the presentation of this content. We endeavor to use only content whose respective providers use the IP address solely for the delivery of the content. However, we do not have any influence on this if the third parties provide the IP address e.g. to save for statistical purposes. As far as we know, we will inform users about it.

### 10.1 Twitter

### Description and purpose

docdok.health uses the technical platform and services of Twitter Inc, 1355 Market Street, Suite 900, San Francisco, CA 94103 U.S.A. for the short message service offered here. Responsible for the data processing of persons living outside the United States is Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2 D02 AX07, Ireland. Please note that you use the Twitter short message service offered here and its functions at your own responsibility. This applies in particular to the use of the interactive functions (e.g. share, rate).

docdok.health has no influence on the type and scope of the data processed by Twitter, the way in which this data is processed and used, or the transfer of this data to third parties. It also has no effective means of control in this respect.

By using Twitter, your personal data will be collected, transferred, stored, disclosed and used by Twitter Inc. and in the process transferred, stored and used in the United States, Ireland and any other country where Twitter Inc. does business, regardless of your residence.

**Legal Basis**

The legal basis is Art.6 para. 1 lit. f) GDPR.

**Receiver**

The data is usually transferred to a Twitter server in the USA and stored there.

Transfer to third Countries

The IP address is transmitted to the already mentioned provider and stored.

**Duration**

The data will be deleted as soon as they are no longer necessary for the purpose for which they were collected. In addition, the data will be deleted if you revoke your consent or request the deletion of your personal data.

**Further data protection information via link**

Information about which data is processed by Twitter and for which purposes it is used can be found in the Twitter privacy policy: https://twitter.com/de/privacy

Twitter Inc. is committed to the principles of the EU-US Privacy Shield. You can find more information on this at: https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO&status=Active

### 11. Duration of storage of personal data

Personal data is stored for the duration of the respective legal retention period. After expiry of the deadline, the data will be routinely deleted, unless there is a need for a contract or fulfillment of the contract.

# 12. Applications (Training & Vacancies)

By submitting their application to us, applicants consent to the processing of their data for the purposes of the application procedure in accordance with the type and scope set out in this Privacy Policy.

If special categories of personal data within the meaning of Art. 9 Para. 1 GDPR are voluntarily provided within the framework of the application procedure, they will also be processed in accordance with Art. 9 Para. 2 lit. b) GDPR (e.g. health data, such as severely disabled status or ethnic origin). Insofar as special categories of personal data within the meaning of Art. 9 para. 1 GDPR are requested from applicants as part of the application procedure, their processing will also be carried out in accordance with Art. 9 para. 2 lit. a) GDPR (e.g. health data if they are required for the exercise of a profession).

If provided, applicants can submit their applications via an online form on our website. The data will be transmitted to us encrypted according to the state of the art.

Applicants can also send us their applications by e-mail. Please note, however, that e-mails are generally not sent in encrypted form and the applicants themselves must ensure that they are encrypted. We therefore cannot assume any responsibility for the transmission path of the application between the sender and the reception on our server and therefore recommend using an online form or postal dispatch. Instead of applying using the online form and e-mail, applicants still have the option of sending their application by post.

In the event of a successful application, the data provided by the applicants can be further processed by us for the purposes of the employment relationship. Otherwise, if the application for a job offer is not successful, the applicant's data will be deleted. Applicant data will also be deleted if an application is withdrawn, which applicants are entitled to do at any time.

Subject to justified revocation by the applicants, the data will be deleted after a period of six months so that we can answer any follow-up questions regarding the application and meet our obligations to provide evidence under the Equal Treatment Act. Invoices for any reimbursement of travel expenses will be archived in accordance with the provisions of tax law.

# 13. Safety

We have taken extensive technical and operational safeguards to protect your data from accidental or intentional manipulation, loss, destruction or access by unauthorized persons. Our security procedures are regularly reviewed and adapted to technological progress. In addition, privacy is granted on an ongoing basis through constant auditing and optimization of the privacy organization.

docdok.health reserves all rights to make changes and updates to this Privacy Policy. This Privacy Policy was created by Keyed GmbH – [www.keyed.de](http://www.keyed.de).