

Data protection declaration for CGM ELVI / CLICKDOC VIDEOSPRECHSTUNDE / CLICKDOC VIDEOBERATUNG of CompuGroup Medical Deutschland AG



1 Introduction

This data protection declaration informs you about the nature, scope, and purposes of the collection and use of personal data when using CGM ELVI / CLICKDOC VIDEOSPRECHSTUNDE / CLICKDOC VIDEOBERATUNG (hereinafter referred to as the product).

The product is provided by CompuGroup Medical Deutschland AG, which is responsible under data protection law for the processing of personal data of the customer, its employees and its patients/guests in connection with the provision and use of the product. The distribution and the conclusion of the contract are carried out by the following companies of CompuGroup Medical SE & Co. KGaA (CGM SE & Co. KGaA) (hereinafter referred to as the contractual partner).

- In Germany:
 - CompuGroup Medical Deutschland AG
 - CGM Clinical Deutschland GmbH
 - CGM Dentalsysteme GmbH
 - CGM Clinical Europe GmbH
 - Lauer-Fischer GmbH
- In Austria
 - CGM Clinical Österreich GmbH
 - CGM Arztsysteme Österreich GmbH
 - INNOMED Gesellschaft für medizinische Softwareanwendungen GmbH

Under item 18, you will find detailed information on all sales partners with contact details, data protection officers, and responsible supervisory authorities.

2 Data protection organization and allocation of responsibilities in data protection

CompuGroup Medical Deutschland AG and the contractual partner, as companies of CGM SE & Co. KGaA, consider the responsible handling and respect of the protection of personal data to be its highest principle. CompuGroup Medical Deutschland AG and the contractual partner always ensure strict compliance with all relevant laws when storing and processing personal data.

CGM SE & Co. KGaA has introduced a central data protection management system that ensures a uniform and high level of protection of personal data within all CGM companies and ensures compliance with the relevant data protection laws.

CompuGroup Medical Deutschland AG is the responsible entity for the conduction of the video consultations and video conferences with the product.

With this data protection declaration, we fulfill our information obligations and provide you with information about the handling of data at CompuGroup Medical Deutschland AG. This data protection declaration refers to the product. The current version of this data protection declaration can be found in the product.

3 Product description

The product is a browser-based software that enables video consultations and video conferences between two and more conversation partners.

A video consultation can be carried out with up to 5 people. The invited patient / guest receives an access code with which he can enter the virtual waiting area. He will then be called by the initiator of the video consultation. The video consultation takes place as a TLS-encrypted peer-to-peer connection, i.e. directly between the participants without an intermediate server. If it is not possible to establish a direct peer-to-peer connection (for example, due to a specially secured firewall), the connection is established via a server. Secure end-to-end encryption is always available.

A video conference can be carried out with up to 10 people. All patients / guests receive a dial-in link by the initiator of the video conference, with which they can directly access the video conference. The video conference is end-to-end encrypted. The call connection is established via a server of CompuGroup Medical Deutschland AG. The video and voice transmission and the screensharing take place in encrypted form via a server.

4 Processing of contractual data of the customer by CompuGroup Medical Deutschland AG or the contractual partner

4.1 Data processing in a contract with CompuGroup Medical Deutschland AG

Contractual data serve to assign, support, and process a contractual relationship (including billing) concluded between the customer (physician, consultant, therapist, hospital, etc.) and CompuGroup Medical Deutschland AG.

CompuGroup Medical Deutschland AG only stores and processes personal data that become known within the scope of this contractual relationship if this is necessary for the conduction of the contract, in particular for order processing and customer service. The legal basis is Art. 6 para. 1 lit b GDPR: Performance of a contract.

Only if consent in accordance with Art. 6 para. 1 lit a GDPR has been given, this data can also be used for product-related surveys and marketing purposes.

Personal data will not be passed on, sold, or otherwise transferred to third parties, unless this is necessary for the purpose of processing the contract (in accordance with Art. 6 para. 1 lit b GDPR) or unless express consent (in accordance with Art. 6 para. 1 lit a GDPR) has been obtained.

For the purpose of processing the contract, the contractual data will be transferred within the group to the central customer administration of CGM SE & Co. KGaA, Maria Trost 21, 56070 Koblenz. The legal basis is Art. 6 para. 1 lit b GDPR: Performance of a contract.

Data protection declaration for CGM ELVI / CLICKDOC VIDEOSPRECHSTUNDE / CLICKDOC VIDEOBERATUNG

of CompuGroup Medical Deutschland AG

V31 Status: May, 22, 2025 Rev.1

Page 1 of 12

Data protection declaration for CGM ELVI / CLICKDOC VIDEO- OSPRECHSTUNDE / CLICKDOC VIDEOBERATUNG of CompuGroup Medical Deutschland AG



CompuGroup Medical Deutschland AG processes the following contractual data of the customer:

- Doctor's office / company / organization
- First and last name
- Address
- Contact data (phone, e-mail address, fax)
- Optional: Bank data for direct debit authorization

The listed data has to be provided by the customer in order for the contractual relationship to come into effect.

The listed data is stored on the servers of CompuGroup Medical Deutschland AG and CGM SE & Co. KGaA in accordance with commercial and tax retention periods.

4.2 Data processing in the case of a contract with a contractual partner

If you have not concluded the contract for the use of the product with CompuGroup Medical Deutschland AG but with another company of CGM SE & Co. KGaA, please refer to the data protection declaration of your contractual partner for information on the processing of the contractual data.

For the provision and use of the product, the necessary personal data of the customer is transferred from the contractual partner to CompuGroup Medical Deutschland AG. Art. 6 para. 1 lit. b GDPR serves as the legal basis: Contract fulfillment. CompuGroup Medical Deutschland AG then processes this data further on the basis of its legitimate interests in being able to provide the product (legal basis: Art. 6 para. 1 lit. f GDPR). This further processing for product provision is in the legitimate interest of CompuGroup Medical Deutschland AG and the contractual partner, who have chosen this division of labor within the Group for reasons of efficiency and quality optimization and also provide for the responsibility of CompuGroup Medical Deutschland AG as the direct operator of the product for reasons of ensuring the highest level of quality.

This data can only be used for product-related surveys and marketing purposes if consent has been given in accordance with Art. 6 para. 1 lit. a GDPR.

The transfer, sale or other transmission of personal data to third parties does not take place unless this is necessary for the purpose of contract processing (pursuant to Art. 6 para. 1 lit. b GDPR) or explicit consent (pursuant to Art. 6 para. 1 lit. a GDPR) has been given.

5 Processing of personal data by CompuGroup Medical Deutschland AG

Personal data is individual information about personal or factual circumstances of an identified or identifiable natural person.

In accordance with the applicable Data Protection Act, we undertake to delete all contractual data, all protocol data, and all data on technical operation after termination of a contract. The exact retention period can be found in the following detailed information.

However, we are legally obligated to observe retention periods under commercial and tax law, which may extend beyond the duration of the contractual relationship.

5.1 Registration data of the customer and practitioner

Registration data serve to create a profile to use the product. The registration data are only stored and processed by CompuGroup Medical Deutschland AG to the extent necessary for the provision and use of the product. Art. 6 para. 1 lit. b GDPR serves as the legal basis: Contract fulfillment, insofar as a direct contract exists. In all other cases, the legal basis is Art. 6 para. 1 lit. f GDPR: Legitimate interest. CompuGroup Medical Deutschland AG processes the registration data of practitioners to enable them to use the product with their own access. Insofar as the term "customer" is used below, this also includes practitioners who have not concluded a direct contract with CompuGroup Medical Deutschland AG. Only if consent in accordance with Art. 6 para. 1 lit. a GDPR has been given, this data can also be used for product-related surveys and marketing purposes.

Personal data will not be passed on, sold, or otherwise transferred to third parties, unless this is necessary for the purpose of processing the contract (in accordance with Art. 6 para. 1 lit. b GDPR) or unless express consent (in accordance with Art. 6 para. 1 lit. a GDPR) has been obtained.

CompuGroup Medical Deutschland AG processes the following registration data of the customer:

- Login name
- First and last name
- Gender
- E-mail address
- Cell phone number For physicians: LANR or physician ID number (to provide the KBV proof)

The listed data has to be provided by the customer in order for the product to be used.

The listed data is stored on the servers of CompuGroup Medical Deutschland AG for the duration of the contractual relationship. This data is deleted two months after end of contract, unless deletion conflicts with retention periods under commercial and tax law. In the event of a revocation or a justified objection, the data will also be deleted immediately after the corresponding declaration.

5.2 Use of the product

The customer has the option to specify the following data in the profile of his product:

Data protection declaration for CGM ELVI / CLICKDOC VIDEO-OSPRECHSTUNDE / CLICKDOC VIDEOBERATUNG
of CompuGroup Medical Deutschland AG

V31 Status: May, 22, 2025 Rev.1

Page 2 of 12

**Data protection declaration for CGM ELVI / CLICKDOC VIDE-
OSPRECHSTUNDE / CLICKDOC VIDEOBERATUNG
of CompuGroup Medical Deutschland AG**



- Country
- Phone
- Fax
- Name, address, and website of doctor's office

The customer can determine on his own whether this personal data (with the exception of the cell phone number) should also be visible to other customers of product. The initial setting provides that these data are not visible. The cell phone number is used exclusively for sending text messages and is in no case visible to other customers of products. Patients / guests who use the product with an access code cannot view any of this data.

The customer has the option to specify the following data when configuring his waiting room:

- Address
- Phone
- E-mail address
- Profile picture
- Wallpaper

If the customer specifies this data when configuring his waiting room, this data will be displayed to waiting patients / guests. The initial setting provides that this data is not automatically taken from the profile of the customer and displayed.

The above-mentioned data is stored on a server of CompuGroup Medical Deutschland AG for the duration of the contractual relationship. The legal basis is Art. 6 para. 1 lit a GDPR: Consent. Consent is given to this extent by providing the optional data. This data is deleted two months after contract end, unless deletion conflicts with retention periods under commercial and tax law. In the event of a revocation or a justified objection, the data will also be deleted immediately after the corresponding declaration.

For billing purposes, a server of CompuGroup Medical Deutschland AG stores how many text messages are sent per month per account for the transmission of access codes, for the use of the two-factor authentication, and to persons in the contact list. The data is deleted on the last day of each month. The legal basis is Art. 6 para. 1 lit f GDPR: Legitimate interest. It is in the legitimate interest of the provider to ensure correct and efficient billing of the services provided and thus to avoid billing errors and the resulting financial losses. The interests of the data subject are safeguarded, as the data is only used for a clearly defined and legitimate purpose. Appropriate protective measures minimize the risk of unauthorized use.

The customer has the option of creating a declaration from the certified video service provider within the software as proof of the application in accordance with Section 291g (4) SGB V regarding the requirements for the video consultation. The following data is processed to create the document:

- Title, first name and surname
- Address
- LANR
- BSNR (if the customer has provided this optional information)

Art. 6 para. 1 lit. b GDPR serves as the legal basis: Contract fulfillment. The listed data - but not the created document - will be stored on the servers of CompuGroup Medical Deutschland AG for the duration of the contractual relationship. This data will be deleted two months after the end of the contract, unless deletion is prevented by retention periods under commercial and tax law. In the event of a revocation or a justified objection, the data will also be deleted immediately after the corresponding declaration.

To ensure the ongoing operation of the system, the following data is collected in pseudonymized form and stored for three months on a server of CompuGroup Medical Deutschland AG. The legal basis is Art. 6 para. 1 lit f GDPR: Legitimate interest. It is in the legitimate interest of the provider to provide the software with as little disruption and reliability as possible, which ultimately also benefits the customer. The data is used exclusively for technical purposes to ensure the security of the software, to detect errors and security gaps and to identify problems and optimization potential (e.g. with regard to system performance). The interests of the data subject are safeguarded, as the data is only used for a clearly defined and legitimate purpose. Suitable protective measures minimize the risk of unauthorized use. In addition, the data is only processed in pseudonymized form.

- Login by the customer as well as patient / guest:
 - ID of the customer / patient / guest
 - Domain through which the login takes place
 - Profile, app, device type
 - Browser name and version
 - Operating system and version
- Sending of text messages
 - Target country
 - Reason for sending a text message (access code, two-factor authentication, contact list)
- Sending of e-mails
 - ID of the customer
 - Domain through which the e-mail is sent
- Creation of an access code
 - ID of the customer
 - Access code
 - Type of waiting room for which the access code was created
- Adding / removing contacts from the contact list
 - ID of the customer

Data protection declaration for CGM ELVI / CLICKDOC VIDEOSPRECHSTUNDE / CLICKDOC VIDEOBERATUNG

of CompuGroup Medical Deutschland AG

V31 Status: May, 22, 2025 Rev.1

Page 3 of 12

- ID of the contact
- Creation of a new waiting room
 - ID of the customer
 - ID of the waiting room
- Statistics export
 - ID of the customer
 - Type of export (PDF / CSV)
 - Period covered by the export

5.3 Conducting a video consultation

To establish the video consultation with the product, the IP address of the customer and that of the patient / guest is transmitted to a server of CompuGroup Medical Deutschland AG. The IP address is anonymized directly and stored for three months. This serves to prevent security and fraud as it can help to detect and prevent suspicious activity.

In a video consultation with the product, the video and voice transmission, the transmission of messages via the chat, and screensharing take place as a TLS-encrypted peer-to-peer connection. There is no storage or recording of the video or voice transmission, of the screensharing, or of the chat.

The first and last name of a customer will be displayed to his patients / guests in the virtual waiting room and during the video consultation / video conference.

When using the whiteboard during a video consultation with the product, the uploaded files are stored temporarily and encrypted on a server of CompuGroup Medical Deutschland AG. When the video consultation ends, the files are deleted.

The above-mentioned processing of the customer's personal data is carried out when conducting a video consultation in accordance with Art. 6 para. 1 lit. b GDPR for the fulfillment of the contract, insofar as a direct contract exists, otherwise from the legitimate interest in enabling the use of the product (Art. 6 para. 1 lit. f GDPR), the processing of the personal data of patients/guests in accordance with Art. 6 para. 1 lit. a, Art. 9 para. 2 lit. a GDPR on the basis of consent.

To ensure the ongoing operation of the system, the following data is collected in pseudonymized form and stored for three months on a server of CompuGroup Medical Deutschland AG. The legal basis is Art. 6 para. 1 lit f GDPR: Legitimate interest.

It is in the legitimate interest of the provider to provide the software with as little disruption and reliability as possible, which ultimately also benefits the customer. The data is used exclusively for technical purposes to ensure the security of the software, to detect errors and security gaps and to identify problems and optimization potential (e.g. with regard to system performance). The interests of the data subject are safeguarded, as the data is only used for a clearly defined and legitimate purpose. Suitable protective measures minimize the risk of unauthorized use. In addition, the data is only processed in pseudonymized form.

- Conducting the video consultation:
 - ID of the customer
 - Start / end of the video consultation
 - Type of participants (customer, patient / guest)
 - Use of the following functions (no content, only "whether" to use):: Whiteboard, chat, screensharing, screenshot
 - Evaluation of the connection quality by the customer and patient / guest
- Telemetry data
 - Was the video consultation conducted with video and audio transmission or with audio transmission only?
 - Which connection type (peer-to-peer connection or server) and which port were used?
 - What was the available bit rate?

5.4 Conducting a video conference

To establish the video conference with the product, the IP address of the customer and that of the patient / guest is transmitted to a server of CompuGroup Medical Deutschland AG. The IP address is anonymized directly and stored for three months. This serves to prevent security and fraud as it can help to detect and prevent suspicious activity.

In a video conference with the product, the video and voice transmission and the screensharing take place over a connection that is encrypted end-to-end. The call connection is established via a server of CompuGroup Medical Deutschland AG. There is no storage or recording of the video or voice transmission and the screensharing.

The first and last name of a customer will be displayed to his patients / guests in the virtual waiting room and during the video consultation / video conference. The above-mentioned processing of the customer's personal data is carried out when conducting a video conference in accordance with Art. 6 para. 1 lit. b GDPR for the fulfillment of the contract, insofar as a direct contract exists, otherwise from the legitimate interest in enabling the use of the product (Art. 6 para. 1 lit. f GDPR), the processing of the personal data of patients/guests in accordance with Art. 6 para. 1 lit. a, Art. 9 para. 2 lit. a GDPR on the basis of consent.

To ensure the ongoing operation of the system, the following data is collected in pseudonymized form and stored for three months on a server of CompuGroup Medical Deutschland AG. The legal basis is Art. 6 para. 1 lit f GDPR: Legitimate interest.

It is in the legitimate interest of the provider to provide the software with as little disruption and reliability as possible, which ultimately also benefits the customer. The data is used exclusively for technical purposes to ensure the security of the software, to detect errors and security

gaps and to identify problems and optimization potential (e.g. with regard to system performance). The interests of the data subject are safeguarded, as the data is only used for a clearly defined and legitimate purpose. Suitable protective measures minimize the risk of unauthorized use. In addition, the data is only processed in pseudonymized form.

- Conducting the video consultation:
 - ID of the customer
 - Start / end of the video consultation
 - Type of participants (customer, patient / guest)
 - Use of the following functions (no content, only "whether" to use):: Whiteboard, chat, screensharing, screenshot
 - Evaluation of the connection quality by the customer and patient / guest
- Telemetry data
 - Was the video consultation conducted with video and audio transmission or with audio transmission only?
 - Which connection type (peer-to-peer connection or server) and which port were used?
 - What was the available bit rate?

5.5 Special categories of personal data

5.5.1 Conducting / participating in a video consultation

CompuGroup Medical Deutschland AG expressly points out that the whiteboard is not intended for diagnostic purposes. The whiteboard may not be used for video consultation content, and other information may only be placed there with the express consent of the patient/guest vis-à-vis the customer. Nevertheless, technical and organizational measures cannot exclude the possibility that customers or their patients / guests may exchange special categories of personal data during a video consultation via the whiteboard of the product. The uploaded files are stored temporarily and encrypted on a server of CompuGroup Medical Deutschland AG. When the video session ends, the files are deleted. Art. 6 para. 1 lit. b GDPR serves as the legal basis: Contract fulfillment vis-à-vis customers, insofar as a direct contract exists, otherwise the legitimate interest in enabling the use of the product (Art. 6 para. 1 lit. f GDPR), and Art. 6 para. 1 lit. a, Art. 9 para. 2 lit. a: Consent, insofar as data of a patient/guest is processed. When using the chat and screensharing during a video consultation with the product, it cannot be excluded by technical-organizational measures that customers or their patients / guests transfer special categories of personal data. The content of the chat and the screensharing is transmitted over a TLS-encrypted peer-to-peer connection and is not stored. Art. 6 para. 1 lit. b GDPR serves as the legal basis: Contract fulfillment vis-à-vis customers, insofar as a direct contract exists, otherwise the legitimate interest in enabling the use of the product (Art. 6 para. 1 lit. f GDPR), and Art. 6 para. 1 lit. a, Art. 9 para. 2 lit. a: Consent, insofar as data of a patient/guest is processed..

The access name and code are stored in the customer's account until the access code has reached its expiration date, until the customer deletes them, the customer's account is deleted after the contract is terminated, or the patient / guest revokes his consent. The deletion by us takes place two months after the termination of the contract by the customer. In case of revocation of his consent by the patient / guest, the customer is obliged to delete the respective data (name and access code of a patient / guest) in his account. The legal basis vis-à-vis the patient / guest is Art. 6 para. 1 lit. a, Art. 9 para. 2 lit. a GDPR: Consent.

During a video consultation, the customer has the option to take a screenshot of the video image of the patient / guest. This is only possible if the patient / guest has given him his consent in advance in accordance with Art. 6 para. 1 lit a, Art. 9 para. 2 lit a GDPR. The request for consent is made in the software. CompuGroup Medical Deutschland AG provides the screenshot to the customer, but there is no storage. The legal basis is Art. 6 para. 1 lit a, Art. 9 para. 2 lit a GDPR: Consent.

5.5.2 Conducting / participating in a video conference

When using the chat and screen sharing during a video conference with the product, it cannot be excluded by technical-organizational measures that customers or their patients / guests transfer special categories of personal data. The content of the chat and screensharing is transmitted encrypted and end-to-end and not stored. Art. 6 para. 1 lit. b GDPR serves as the legal basis: Contract fulfillment vis-à-vis customers, insofar as a direct contract exists, otherwise the legitimate interest in enabling the use of the product (Art. 6 para. 1 lit. f GDPR), and Art. 6 para. 1 lit. a, Art. 9 para. 2 lit. a: Consent, insofar as data of a patient/guest is processed..

In a video conference with the product, the name and contact details (cell phone number/e-mail address) of the patient / guest with whom the customer conducts the video conference, is transmitted to a server of CompuGroup Medical Deutschland AG. The name and contact details (cell phone number/e-mail address) of the patient / guest will be stored in the customer's account until the conference is automatically deleted (one day after the end of the conference, resp. in case of serial appointments one day after the end of the last conference) or until the customer deletes this information in his account, the customer's account is deleted after termination of the contract, or the patient / guest revokes their consent. In case of revocation of his consent by the patient / guest, the customer is obliged to delete the respective data (name and contact details of a patient / guest) in his account. The legal basis vis-à-vis the patient / guest is Art. 6 para. 1 lit. a, Art. 9 para. 2 lit. a GDPR: Consent and Art. 6 para. 1 lit b GDPR: Performance of a contract.

5.6 Data of patients / guests

5.6.1 Participation in a video consultation

To establish the video consultation with the product, the IP address of the customer and that of his patient / guest is transmitted to a server of CompuGroup Medical Deutschland AG. The IP address is anonymized directly and stored for three months. This serves to prevent security and fraud as it can help to detect and prevent suspicious activity. The processing of personal data of the patient / guest takes place on the basis of consent (in accordance with Art. 6 para. 1 lit a, Art. 9 para. 2 lit a GDPR).

In a video consultation, the name and access code of a patient / guest with whom the customer conducts a video consultation with the product, is transmitted to a server of CompuGroup Medical Deutschland AG. The access name and code are stored in the customer's account until the access code has reached its expiration date, until the customer deletes them, the customer's account is deleted after the contract is terminated, or the patient / guest revokes his consent. The deletion by us takes place two months after the termination of the contract by the customer. In

Data protection declaration for CGM ELVI / CLICKDOC VIDE- OSPRECHSTUNDE / CLICKDOC VIDEOBERATUNG of CompuGroup Medical Deutschland AG



case of revocation of his consent by the patient / guest, the customer is obliged to delete the respective data (name and access code of a patient / guest) in his account. The legal basis vis-à-vis the patient / guest is Art. 6 para. 1 lit. a Art. 9 para. 2 lit. a GDPR: Consent.

If the access code to a video consultation is sent to the patient / guest by e-mail, the e-mail address is transmitted to a server of CompuGroup Medical Deutschland AG. The e-mail address will then be deleted immediately. The legal basis is Art. 6 para. 1 lit. a, Art. 9 para. 2 lit. a GDPR: Consent. If the access code is sent to the patient / guest by text message, the cell phone number is transmitted to a server of dimater GmbH for sending the access code. The cell phone number is stored in anonymous form for three months for the purpose of tracking. The legal basis is Art. 6 para. 1 lit. a, Art. 9 para. 2 lit. a GDPR: Consent.

When a patient / guest participates in a video consultation, the following data is collected in pseudonymized form to ensure the ongoing operation of the system and stored for three months on a server of CompuGroup Medical Deutschland AG. The legal basis is Art. 6 para. 1 lit. f GDPR: Legitimate interest.

It is in the legitimate interest of the provider to provide the software with as little disruption and reliability as possible, which ultimately also benefits the customer. The data is used exclusively for technical purposes to ensure the security of the software, to detect errors and security gaps and to identify problems and optimization potential (e.g. with regard to system performance). The interests of the data subject are safeguarded, as the data is only used for a clearly defined and legitimate purpose. Suitable protective measures minimize the risk of unauthorized use. In addition, the data is only processed in pseudonymized form.

- Login by the patient / guest
 - ID of the patient / guest
 - Domain through which the login takes place
 - Profile, app, device type
 - Browser name and version
 - Operating system and version
- Evaluation of the connection quality by the patient / guest
- Was the video consultation conducted with video and audio transmission or with audio transmission only?
- Which connection type (peer-to-peer connection or server) and which port were used?
- What was the available bit rate?
- Was the video consultation conducted over Wifi or LTE?

During a video consultation, the customer has the option to take a screenshot of the video image of the patient / guest. This is only possible if the patient / guest has given him his consent in advance in accordance with Art. 6 para. 1 lit. a, Art. 9 para. 2 lit. a GDPR. The request for consent is made in the software. CompuGroup Medical Deutschland AG provides the screenshot to the customer, but there is no storage. The legal basis is Art. 6 para. 1 lit. a, Art. 9 para. 2 lit. a GDPR: Consent.

5.6.2 Participation in a video conference

To establish the video conference with the product, the IP address of the customer and that of his patient / guest is transmitted to a server of CompuGroup Medical Deutschland AG. The IP address is anonymized directly and stored for three months. This serves to prevent security and fraud as it can help to detect and prevent suspicious activity. The processing of personal data of the patient / guest takes place on the basis of consent (in accordance with Art. 6 para. 1 lit. a, Art. 9 para. 2 lit. a GDPR).

In a video conference with the product, the name of the patient / guest with whom the customer conducts the video conference, is transmitted to a server of CompuGroup Medical Deutschland AG.

If the access code for a video conference is sent to the patient / guest by e-mail and / or text message, the e-mail address and / or cell phone number is transmitted to the server of CompuGroup Medical Deutschland AG. The cell phone number is also transmitted to the server of dimater GmbH for sending the dial-in link. The legal basis is Art. 6 para. 1 lit. a, Art. 9 para. 2 lit. a GDPR: Consent.

The name and contact details (cell phone number/e-mail address) of the patient / guest will be stored in the customer's account until the conference is automatically deleted (one day after the end of the conference, resp. in case of serial appointments one day after the end of the last conference) or until the customer deletes this information in his account, the customer's account is deleted after termination of the contract, or the patient / guest revokes their consent. In case of revocation of his consent by the patient / guest, the customer is obliged to delete the respective data (name and contact details of a patient / guest) in his account. The legal basis vis-à-vis the patient / guest is Art. 6 para. 1 lit. a, Art. 9 para. 2 lit. a GDPR: Consent and Art. 6 para. 1 lit. b GDPR: Performance of a contract.

When a patient / guest participates in a video conference, the following data is collected in pseudonymized form to ensure the ongoing operation of the system and stored for three months on a server of CompuGroup Medical Deutschland AG. The legal basis is Art. 6 para. 1 lit. f GDPR: Legitimate interest.

It is in the legitimate interest of the provider to provide the software with as little disruption and reliability as possible, which ultimately also benefits the customer. The data is used exclusively for technical purposes to ensure the security of the software, to detect errors and security gaps and to identify problems and optimization potential (e.g. with regard to system performance). The interests of the data subject are safeguarded, as the data is only used for a clearly defined and legitimate purpose. Suitable protective measures minimize the risk of unauthorized use. In addition, the data is only processed in pseudonymized form.

- Evaluation of the connection quality by the patient / guest

5.7 Use of an organization administrator to manage accounts for the product in large doctor's offices / facilities / organizations

In large doctor's offices / facilities / organizations, the management of accounts for the product can be carried out by an organization administrator. For this purpose, the doctor's office / facility / organization receives a separate account for the organization administrator, with which the following personal data can be viewed and exported:

- First and last name
- LANR / physician ID number
- Contact details: E-mail, phone number, cell phone number, fax, address
- Website

The organization administrator can only view the data of the accounts assigned to his doctor's office / facility / organization. He can also trigger the system to send an e-mail with which the user can reset his password. Art. 6 para. 1 lit. b GDPR serves as the legal basis: Contract fulfillment vis-à-vis customers, insofar as a direct contract exists, otherwise the legitimate interest in enabling the use of the product (Art. 6 para. 1 lit. f GDPR), and Art. 6 para. 1 lit. a, Art. 9 para. 2 lit. a: Consent, insofar as data of a patient/guest is processed. The data will only be stored for the duration of the contractual relationship and will be deleted two months after termination of the contract.

6 Processors and recipients of personal data

CompuGroup Medical Deutschland AG has the following services, which are directly related to the provision of the main service, performed as order processing by subcontractors:

| Company Subcontractor | Address / Country | Service |
|----------------------------------|---|---|
| CompuGroup Medical SE & Co. KGaA | Maria Trost 21, 56070 Koblenz Germany | Server hosting and management Receiving personal data |
| dimater GmbH | Campusallee 10, 51379 Leverkusen Germany | Sending text messages from the product Receiving personal data |

7 Use of cookies within the software

No cookies are used in the product.

8 Transfer of data to third countries

There is no transfer of data to third countries.

9 Profiling / automated decision making

The software does not contain profiling and no automated decision making.

10 Commitment to confidentiality, data protection training

We restrict access to contractual and protocol data and data on technical operation to employees and contractors of CompuGroup Medical Deutschland AG and of CGM for whom such information is absolutely necessary to perform the services under this contract. These persons are bound to comply with this data protection declaration and confidentiality obligations (GDPR, § 203 German Penal Code). Violation of these confidentiality obligations may be punishable by termination and criminal prosecution.

Employees are regularly trained in data protection.

11 Security measures / avoidance of risks

CompuGroup Medical Deutschland AG takes all necessary technical and organizational security measures to protect your personal data from unauthorized access, unauthorized changes, disclosure, loss, destruction, and other misuse. This includes internal audits of our procedures for

data collection, storage, and processing as well as security measures to protect against unauthorized access to systems on which we store contractual data or data on technical operation.

12 Technical and organizational measures

To ensure data security, CompuGroup Medical Deutschland AG in cooperation with CompuGroup Medical SE regularly checks the state of the art. For this purpose, typical damage scenarios are determined and then the protection requirements for individual personal data are derived and divided into damage categories, among other things. A risk assessment is also carried out.

The following principles are standardized for the implementation of suitable technical and organizational measures:

- **Backup / data storage**
To prevent the loss of data, the data is backed up regularly.
- **Privacy by design**
CompuGroup Medical Deutschland AG ensures that data protection and data security are already considered in the planning and development of IT systems. This prevents the circumstance that the specifications of data protection and data security only have to be implemented after the provision of IT systems by expensive and time-consuming additional programming. Possibilities such as deactivation of functionalities, authentication, or encryption are already considered during production.
- **Privacy by default**
Furthermore, the products of CompuGroup Medical Deutschland AG are already preset in a data protection-friendly manner in the delivery condition, so that only personal data necessary for the intended purpose is processed.
The initial setting in the account of a customer is that the customer is not visible in the contact search and thus cannot be found or called by video by other customers. After the first login, the customer is asked whether this setting should be retained. This setting can be changed at any time later.
- **Communication by e-mail**
Should you wish to contact CompuGroup Medical Deutschland AG by e-mail, we would like to point out that the confidentiality of the information transmitted is not guaranteed. The content of e-mails can be viewed by third parties. We therefore recommend that you send us confidential information by post only.
- **Remote maintenance**
In exceptional cases it may occur that employees or contractors of CompuGroup Medical Deutschland AG have to access customer data in order to execute the contract with the respective customer. There are central regulations of CompuGroup Medical Deutschland AG for this.
 - The remote maintenance accesses remain closed and are only activated by customers.
 - Passwords to customer systems are only issued for remote maintenance.
 - Special activities are safeguarded by the 4-eye principle through qualified persons.
 - We use remote maintenance media for which the customer must actively release access and can follow the activities.
 - The documentation of the remote maintenance access takes place in the CRM system. To be documented: Executing employee, time (date / time), duration, target system, the remote maintenance medium, short description of the activity. In case of critical activities, the employees involved are also recorded in accordance with the 4-eye principle.
 - Recording of the sessions is prohibited.

13 Rights of the data subjects

Personal data of the customer

When processing personal data, the GDPR grants data subjects certain rights:

- **Right of access (Art. 15 GDPR)**
You have the right to request confirmation as to whether you are a data subject and whether personal data relating to you is being processed. If this is the case, you have a right to information about this personal data and to the information listed in detail in Art. 15 GDPR.
- **Right to rectification (Art. 16 GDPR)**
You have the right to request the rectification of inaccurate personal data concerning you and, if necessary, the completion of incomplete data without delay.
- **Right to erasure (Art. 17 GDPR)**
You have the right to request that personal data concerning you be deleted without delay, provided that one of the reasons listed in detail in Art. 17 GDPR applies. We undertake to delete all contract data, all protocol data, and all data on technical operation after termination of your contract without being asked to do so.
However, we are legally obligated to observe retention periods under commercial and tax law, which may extend beyond the duration of the contractual relationship. Data on technical operation will only be kept as long as it is technically necessary, but deleted upon termination of your contract.

- **Right to restriction of processing (Art. 18 GDPR)**

You have the right to request the restriction of processing provided that one of the reasons listed in Art. 18 of the GDPR applies.

- **Right to data portability (Art. 20 GDPR)**

In certain cases, which are listed in detail in Art. 20 GDPR, you have the right to receive the personal data concerning you in a structured, common, and machine-readable format or to request the transfer of this data to a third party.

- **Right to revocation (Art. 7 GDPR)**

If the processing of data is based on your consent, you are entitled to revoke your consent to the use of your personal data at any time in accordance with Art. 7 para. 3 GDPR. Please note that the revocation is only effective for the future. Processing that took place before the revocation is not affected.

- **Right to object (Art. 21 GDPR)**

If data is collected on the basis of Art. 6 para. 1 p. 1 lit. f GDPR (data processing for the purposes of the legitimate interests) or on the basis of Art. 6 para. 1 p. 1 lit. e GDPR (data processing for the performance of a task carried out in the public interest or in the exercise of official authority), you have the right to object to the processing at any time for reasons arising from your particular situation. In the case of processing of data for advertising purposes, you may object to further processing at any time without stating a reason. We will then no longer process the personal data unless there are demonstrably compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or the processing serves to assert, exercise, or defend legal claims.

- **Right to lodge a complaint with a supervisory authority (Art. 77 GDPR)**

In accordance with Art. 77 GDPR, you have the right to lodge a complaint with a supervisory authority if you are of the opinion that the processing of data concerning you violates data protection regulations.

At the end of the data protection declaration, you will find the contact details of our data protection officer for asserting your rights.

Personal data of patients / guests

When processing personal data, the GDPR grants data subjects certain rights:

- **Right of access (Art. 15 GDPR)**

You have the right to request confirmation as to whether you are a data subject and whether personal data relating to you is being processed. If this is the case, you have a right to information about this personal data and to the information listed in detail in Art. 15 GDPR.

- **Right to rectification (Art. 16 GDPR)**

You have the right to request the rectification of inaccurate personal data concerning you and, if necessary, the completion of incomplete data without delay.

- **Right to erasure (Art. 17 GDPR)**

You have the right to request that personal data concerning you be deleted without delay, provided that one of the reasons listed in detail in Art. 17 GDPR applies. We undertake to delete all contractual data, all protocol data, and all data on technical operation after termination of your contract without being asked to do so.

However, we are legally obligated to observe retention periods under commercial and tax law, which may extend beyond the duration of the contractual relationship. Data on technical operation will only be kept as long as it is technically necessary, but deleted upon termination of your contract.

- **Right to restriction of processing (Art. 18 GDPR)**

You have the right to request the restriction of processing provided that one of the reasons listed in Art. 18 of the GDPR applies.

- **Right to data portability (Art. 20 GDPR)**

In certain cases, which are listed in detail in Art. 20 GDPR, you have the right to receive the personal data concerning you in a structured, common, and machine-readable format or to request the transfer of this data to a third party.

- **Right to revocation (Art. 7 GDPR)**

If the processing of data is based on your consent, you are entitled to revoke your consent to the use of your personal data at any time in accordance with Art. 7 para. 3 GDPR. You can revoke your consent to the processing of data when conducting the video consultation / video conference at any time by terminating the video consultation / video conference. We will then no longer process any data from you as the responsible party. The revocation has no influence on data processing that has already taken place.

- **Right to object (Art. 21 GDPR)**

If data is collected on the basis of Art. 6 para. 1 p. 1 lit. f GDPR (data processing for the purposes of the legitimate interests) or on the basis of Art. 6 para. 1 p. 1 lit. e GDPR (data processing for the performance of a task carried out in the public interest or in the exercise of official authority), you have the right to object to the processing at any time for reasons arising from your particular situation. In the case of processing of data for advertising purposes, you may object to further processing at any time without stating a reason. We will then no longer process the personal data unless there are demonstrably compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or the processing serves to assert, exercise, or defend legal claims.

- **Right to lodge a complaint with a supervisory authority (Art. 77 GDPR)**

In accordance with Art. 77 GDPR, you have the right to lodge a complaint with a supervisory authority if you are of the opinion that the processing of data concerning you violates data protection regulations.

At the end of the data protection declaration, you will find the contact details of our data protection officer for asserting your rights.

Data protection declaration for CGM ELVI / CLICKDOC VIDE- OSPRECHSTUNDE / CLICKDOC VIDEOBERATUNG of CompuGroup Medical Deutschland AG



14 Enforcement

CompuGroup Medical Deutschland AG regularly and consistently monitors compliance with these data protection regulations. If CompuGroup Medical Deutschland AG receives formal complaints, it will contact the author regarding his concerns to resolve any complaints regarding the use of personal information. CompuGroup Medical Deutschland AG undertakes to cooperate with the relevant authorities, including data protection supervisory authorities, to this end.

15 Changes to this data protection declaration

Please note that this data protection declaration may be supplemented and amended from time to time. If the changes are significant, we will issue a more detailed notification. Each version of this data protection declaration can be identified by its date and version status in the footer of this data protection declaration (status). In addition, we archive all previous versions of these data protection declarations for your inspection upon request at the data protection officer's of CompuGroup Medical Deutschland AG.

16 Responsible for CompuGroup Medical Deutschland AG

CompuGroup Medical Deutschland AG
Maria Trost 21, 56070 Koblenz
Germany

Contact details:
Phone: +49 (0) 261 5400 1400
E-mail: info-lawell@cgm.com

17 Responsible for the contractual partners

In Germany:

| Company Providers and contractors of the customer (doctor, therapist, consultant, ...) | Data protection officer If you have any questions regarding the processing of your personal data, you can contact the data protection officer, who is at your disposal in case of requests for information or complaints. | Responsible data protection supervisory authority |
|---|--|--|
| CGM Clinical Deutschland GmbH Maria Trost 25, 56070 Koblenz Germany Contact details: Phone: +49 (0) 261 8000-1780 E-mail: info.clinical.de@cgm.com | Hans-Josef Gerlitz CompuGroup Medical SE & Co. KGaA Maria Trost 21, 56070 Koblenz Germany Contact details: HansJosef.Gerlitz@cgm.com | The State Commissioner for Data Protection and Freedom of Information Rhineland-Palatinate Hintere Bleiche 34, 55116 Mainz Germany Contact details: Phone: +49 (0) 6131 8920-0 E-mail: poststelle@datenschutz.rlp.de |
| CGM Dentalsysteme GmbH Maria Trost 25, 56070 Koblenz Germany Contact details: Phone: +49 (0) 261 8000-1900 E-mail: info.cgm-dentalsysteme@cgm.com | Hans-Josef Gerlitz CompuGroup Medical SE & Co. KGaA Maria Trost 21, 56070 Koblenz Germany Contact details: HansJosef.Gerlitz@cgm.com | The State Commissioner for Data Protection and Freedom of Information Rhineland-Palatinate Hintere Bleiche 34, 55116 Mainz Germany Contact details: Phone: +49 (0) 6131 8920-0 E-mail: poststelle@datenschutz.rlp.de |
| CGM Clinical Europe GmbH Maria Trost 21, 56070 Koblenz Germany Contact details: Phone: +49 (0) 261 8085-17010 E-mail: info@cgm.com | Hans-Josef Gerlitz CompuGroup Medical SE & Co. KGaA Maria Trost 21, 56070 Koblenz Germany Contact details: HansJosef.Gerlitz@cgm.com | The State Commissioner for Data Protection and Freedom of Information Rhineland-Palatinate Hintere Bleiche 34, 55116 Mainz Germany Contact details: |

**Data protection declaration for CGM ELVI / CLICKDOC VIDE-
OSPRECHSTUNDE / CLICKDOC VIDEOBERATUNG**
of CompuGroup Medical Deutschland AG



| | | |
|---|--|--|
| | | Phone: +49 (0) 6131 8920-0 E-mail: poststelle@datenschutz.rlp.de |
| LAUER-FISCHER GmbH Dr.-Mack-Straße 95, 90762 Fürth Germany Contact details: Phone: +49 (0) 911 974 760 E-mail: info.lauer@cgm.com | | The State Commissioner for Data Protection and Freedom of Information Bavaria Post office box 22 12 19, 80502 München Germany Contact details: Phone: +49 (0) 89 2126720 E-mail: poststelle@datenschutz-bayern.de |

In Austria:

| Company Providers and contractors of the customer (doctor, therapist, consultant, ...) | Data protection officer If you have any questions regarding the processing of your personal data, you can contact the data protection officer, who is at your disposal in case of requests for information or complaints. | Responsible data protection supervisory authority |
|---|---|---|
| CGM Clinical Österreich GmbH Pachergasse 2, 4400 Steyr Austria Contact details: Phone: +43 (0) 7252 587 0 E-mail: ssc.clinical.at@cgm.com | Harald Lacherstorfer CGM Arztsysteme Österreich GmbH Geranienstraße 1, 4481 Asten Austria Contact details: Harald.Lacherstorfer@cgm.com | Austrian Data Protection Authority Barichgasse 40-42 1030 Wien Austria Contact details: Phone number: +43 1 52 152-0 E-mail: dsb@dsb.gv.at |
| CGM Arztsysteme Österreich GmbH Ricoweg 22, 2351 Wiener Neudorf Austria Contact details: Phone: +43 (0) 50 818 100 E-mail: arztsysteme.at@cgm.com | Harald Lacherstorfer CGM Arztsysteme Österreich GmbH Geranienstraße 1, 4481 Asten Austria Contact details: Harald.Lacherstorfer@cgm.com | Austrian Data Protection Authority Barichgasse 40-42 1030 Wien Austria Contact details: Phone number: +43 1 52 152-0 E-mail: dsb@dsb.gv.at |
| INNOMED Gesellschaft für medizinische Softwareanwendungen GmbH Ricoweg 22, 2351 Wiener Neudorf Austria Contact details: Phone: +43 (0) 2236 8000 E-mail: office@innomed.at | Harald Lacherstorfer CGM Arztsysteme Österreich GmbH Geranienstraße 1, 4481 Asten Austria Contact details: Harald.Lacherstorfer@cgm.com | Austrian Data Protection Authority Barichgasse 40-42 1030 Wien Austria Contact details: Phone number: +43 1 52 152-0 E-mail: dsb@dsb.gv.at |

18 Data protection officer

If you have any questions regarding the processing of your personal data, you can contact the data protection officer, who is at your disposal in case of requests for information or complaints.

Hans-Josef Gerlitz
CompuGroup Medical SE & Co. KGaA, Maria Trost 21, 56070 Koblenz
Phone number: +49 261 8000 1667
E-mail: HansJosef.Gerlitz@cgm.com

19 Responsible data protection supervisory authority

For CompuGroup Medical Deutschland AG the responsible data protection supervisory authority is

the State Commissioner for Data Protection and Freedom of Information Rhineland-Palatinate
Hintere Bleiche 34, 55116 Mainz
Germany

Contact details:
Phone: +49 (0) 6131 8920-0

Data protection declaration for CGM ELVI / CLICKDOC VIDEOSPRECHSTUNDE / CLICKDOC VIDEOBERATUNG
of CompuGroup Medical Deutschland AG



E-mail: poststelle@datenschutz.rlp.de