

Data protection declaration for the CGM Video consultation of La-Well Systems GmbH / a company of CompuGroup Medical SE



1 Data protection organization and allocation of responsibilities in data protection

La-Well Systems GmbH, as a company of CGM SE, considers the responsible handling and respect of the protection of personal data to be its highest principle. La-Well Systems GmbH always ensures strict compliance with all relevant laws when storing and processing personal data.

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

With this data protection declaration, we fulfil our information obligations and provide information about the handling of data at La-Well Systems GmbH. This data protection declaration refers to the products CGM ELVI and CLICKDOC VIDEO CONSULTATION (hereinafter referred to as CGM Video consultation).

The latest version of this data protection declaration can be found in the CGM Video consultation.

2 CGM Video consultation

La-Well Systems GmbH provides customers and their patients/guests with access to the CGM Video consultation via the internet platforms <https://visite.elvi.de>, <https://beratung.elvi.de>, and <https://clickdoc.elvi.de/#/login>. This is a browser-based software solution for video communication. It enables video telephony, video group conferences, data exchange, and screen sharing.

During a video session with the CGM Video consultation, the communication takes place as SSL-encrypted peer-to-peer connection, i.e. directly between the participants without an intermediate server. There is no storage of exchanged data or the content of communication between customers and their patients/guests.

3 Processing of personal data by La-Well Systems GmbH

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

In accordance with the Data Protection Act, we undertake to delete all contract data, all protocol data, and all data on technical operation after termination of a contract.

However, we are legally obliged to observe storage periods under commercial and tax law, which may extend beyond the duration of the contractual relationship. Data for technical operation will only be kept as long as it is technically necessary, but deleted at the latest after termination of a contract.

3.1 Contract and registration data

Contract and registration data serve to assign and support a contractual relationship concluded between the customer and La-Well Systems GmbH.

La-Well Systems GmbH shall only store and process personal data that become known within the scope of this contractual relationship if this is necessary for the execution of the contract, in particular for order processing and customer service.

Only with consent can this data 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 or unless express consent has been obtained. For example, it may be necessary for La-Well Systems GmbH to pass on address and order data to sales and service partners when ordering products for shipping hardware or connectivity services.

For the processing of general or support inquiries, registrations, and the conclusion of contracts regarding the CGM Video consultation, the contract and registration data and the data mentioned under 3. 2 will be forwarded within the group to the central customer administration of CompuGroup Medical SE, Maria Trost 21, 56070 Koblenz (represented by the Board of Directors Frank Gotthardt (Chairman), Frank Brecher, Dr. Ralph Körfgen, Dr. Eckart Pech, Michael Rauch, Hannes Reichl; Chairman of the Supervisory Board Dr. Klaus Esser).

Depending on the country in which the CGM Video consultation is used and the type of customer (e.g. doctor in private practice, pharmacy, etc.) of the CGM Video consultation, the contract and registration data and the personal data listed under 3.2 can also be passed on within the CGM Video consultation to the following companies:

Applies to all using customers in all countries:

Company subcontractor	Address/country	Service
Interxion Deutschland GmbH	Hanauer Landstraße 298 60314 Frankfurt am Main Germany	Server hosting and management
CompuGroup Medical SE	Maria Trost 21 56070 Koblenz Germany	<ul style="list-style-type: none">• Server hosting and management• Processing of registrations and conclusion of contracts with regard to the CGM Video consultation
Message Networks GmbH	Stresemannstr. 12 40210 Düsseldorf	Sending of text messages from the CGM Video consultation

**Data protection declaration for the CGM Video consultation
of La-Well Systems GmbH / a company of CompuGroup Medical SE**



	Germany	
Cloudflare, Inc.	101 Townsend Street San Francisco, California 94107 USA	Bundling of requests to the server and storage of static files of the website to speed up the page loading
FastBill GmbH	Taunustor 1-3, 60311 Frankfurt am Main Germany	Hosting of the CRM system to manage general or support requests, registrations, and conclusion of contracts

Applies to using customers (except dentists and pharmacies) in Germany:

Company subcontractor	Address/country	Service
CompuGroup Medical Deutschland AG	Maria Trost 21 56070 Koblenz Germany	Handling of general or support inquiries, registrations, and conclusion of contracts when using CGM Video consultation in Germany
CGM Clinical Deutschland GmbH	Maria Trost 25 56070 Koblenz Germany	Handling of general or support inquiries, registrations, and conclusion of contracts when using CGM Video consultation in Germany

Applies to using customers (dentists) in Germany:

Company subcontractor	Address/country	Service
CompuGroup Medical Dentalsysteme GmbH	Maria Trost 25 56070 Koblenz Germany	Handling of general or support inquiries, registrations, and conclusion of contracts when using CGM Video consultation in Germany by dentists

Applies to using customers (pharmacies) in Germany:

Company subcontractor	Address/country	Service
LAUER-FISCHER GmbH	Dr.-Mack-Straße 95 90762 Fürth Germany	Handling of general or support inquiries, registrations, and conclusion of contracts when using CGM Video consultation in Germany by pharmacies

Applies to using customers in Switzerland:

Company subcontractor	Address/country	Service
CompuGroup Medical Schweiz AG	Gartenstrasse 9 3007 Bern Switzerland	Handling of general or support inquiries, registrations, and conclusion of contracts when using CGM Video consultation in Switzerland

Applies to using customers in Austria:

Company subcontractor	Address/country	Service
CompuGroup Medical CEE GmbH	Neulinggasse 29 1030 Wien Austria	Handling of general or support inquiries, registrations, and conclusion of contracts when using CGM Video consultation in Austria

Applies to using customers in France:

**Data protection declaration for the CGM Video consultation
of La-Well Systems GmbH / a company of CompuGroup Medical SE**



Company subcontractor	Address/country	Service
CompuGroup Medical France SAS Business Unit CLICKDOC	55, Avenue des Champs Pierreux 92012 Nanterre Cedex France	Handling of general or support inquiries, registrations, and conclusion of contracts when using CGM Video consultation in France

Applies to using customers in Spain:

Company subcontractor	Address/country	Service
Medigest Consultores S.L.	C/ Orense 6 planta 1 oficina 2 28020 Madrid Spain	Handling of general or support inquiries, registrations, and conclusion of contracts when using CGM Video consultation in Spain

Applies to using customers in the Netherlands:

Company subcontractor	Address/country	Service
CompuGroup Medical Nederland BV,	Nobelweg 32 6101 XB ECHT The Netherlands	Handling of general or support inquiries, registrations, and conclusion of contracts when using CGM Video consultation in the Netherlands

Applies to using customers in the Czech Republic:

Company subcontractor	Address/country	Service
CompuGroup Medical Česká republika s.r.o.	Bucharova 2657/12 158 00 Praha 5 Czech Republik	Handling of general or support inquiries, registrations, and conclusion of contracts when using CGM Video consultation in the Czech Republic

Applies to using customers in Belgium:

Company subcontractor	Address/country	Service
CompuGroup Medical Belgium bvba	Brusselsesteenweg 283/10 9230 Nevele Belgium	Handling of general or support inquiries, registrations, and conclusion of contracts when using CGM Video consultation in Belgium

Data protection declaration for the CGM Video consultation of La-Well Systems GmbH / a company of CompuGroup Medical SE



Applies to using customers in Italy:

Company subcontractor	Address/country	Service
CompuGroup Medical Italia S.p.A.	Via A. Olivetti 10 70056 Molfetta (BA) Italy	Handling of general or support inquiries, registrations, and conclusion of contracts when using CGM Video consultation in Italy

La-Well Systems GmbH collects the following contract and registration data of the customer in the CGM Video consultation:

- Login name
- First and last name
- Gender
- Address
- E-mail address
- For doctors in addition to verification: LANR or doctor's ID number
- Optional: Bank details (direct debit authorization)

Customers have the right to information about their stored data, to correction, blocking, or deletion of this data.

3.2 Personal data within the CGM Video consultation

Within the CGM Video consultation, the customer can optionally provide the following data in addition to his contract and registration data:

- Date of birth
- Country
- Phone number (landline)
- Cell phone number
- Fax
- Name, address, and website of doctor's office
- Information on the exercised subject area

With the exception of the cell phone number and the date of birth, these personal data within the CGM video consultation can also be seen by other customers of the CGM Video consultation. Patients/guests who use the CGM Video consultation by means of access codes are excluded from this. They cannot view any of this data.

The data is stored on the servers of La-Well Systems GmbH, CGM SE, and Interxion Deutschland GmbH in Germany for the duration of the contractual relationship. After termination of the contractual relationship the data will be deleted.

Depending on the country in which the CGM Video consultation is used and the type of customer (e.g. general practitioner, pharmacy, etc.) of the CGM Video consultation, the personal data within the CGM Video consultation and the contract and registration data listed under 3.2 may also be passed on to the companies listed under 3.1.

3.3 Accessing the website with the login form via elvi.visite.de / clickdoc.elvi.de / beratung.elvi.de

When accessing the website with the login form via elvi.visite.de / clickdoc.elvi.de / beratung.elvi.de by customers and their patients/guests, the company Cloudflare, Inc. bundles the requests to the server and stores static files of the website. This serves to speed up the construction of the website. Thereby, the access data and the signalling data (IP addresses) of the customers and their patients/guests are transmitted to Cloudflare Inc. The data is stored for one year after the last use. Processing and storage are usually carried out in computer centers in the EU, provided that the customer and their patients/guests are located in the EU. Deviations may occur if all Cloudflare computer centers in a country fail and the geographically closest computer center is located outside the EU or one of the participants is located outside the EU.

The use of the company Cloudflare refers only to the login process and in no way affects the execution of the video consultation.

The harmlessness of using Cloudflare for the login process for the CGM Video consultation was confirmed by tekit Consult Bonn GmbH (TÜV Saarland). Cloudflare Inc. is recommended by the Federal Office for Information Security as a qualified DDoS-Mitigation service provider and is a Privacy Shield participant (<https://www.privacyshield.gov/participant?id=a2zt0000000GnZKAA0>).

In order to make misuse of his account quickly recognizable to the customer, the date and time of his last login are displayed in his profile. This data is stored on the servers of La-Well Systems GmbH.

3.4 Conducting a CGM Video consultation

To establish the video session by means of the CGM Video consultation, the IP address of the customer and that of his patients/guests is transmitted to the server of La-Well Systems GmbH. The IP address is not stored persistently.

In a video session using CGM Video consultation, the video and voice transmission, the transmission of messages via the chat, and screen sharing takes place as an SSL-encrypted peer-to-peer connection, i.e. directly between the participants without an intermediate server. This data is not stored or recorded.

Data protection declaration for the CGM Video consultation of La-Well Systems GmbH / a company of CompuGroup Medical SE



When using the whiteboard during the CGM Video consultation, the uploaded files are stored temporarily and encrypted on the server of La-Well Systems GmbH. When the video session ends, the files are deleted.

When conducting a CGM Video consultation, the following data is collected in anonymous form for statistical purposes:

- Start/end of the video consultation
- Number of participants of the video consultation
- Client information on the operating system

3.4.1 Addition for the use of the CLICKDOC video consultation powered by CGM ELVI as part of the CGM campaign "Doctors against Corona"

The CGM campaign "Doctor's against Corona" offers patients with suspected corona infection the opportunity to fill out a WHO questionnaire on the website <https://cgm-hilft.clickdoc.de/>. The evaluation of the questionnaire provides various recommendations for action, including the use of the CLICKDOC video consultation. The patient can agree to this recommendation and can on request be added to a global waiting list for a CLICKDOC video consultation.

Doctors, who are participate to the CGM campaign "Doctors against Corona", can view this global waiting list and invite individual patients from this waiting list for a video consultation to their personal waiting room at the CLICKDOC video consultation. The patient cannot influence which doctor gets in touch with them.

During the video consultation, the doctor receives the contact and billing data of the patient and the information from the questionnaire, which he provided in advance on <https://cgm-hilft.clickdoc.de/>, as a PDF document. This gives the doctor the opportunity to adequately advise the patient and to bill for the video consultation. The patient agrees to this transfer to <https://cgm-hilft.clickdoc.de/> by agreeing to the terms of use. The file is encrypted and saved on the servers of La-Well Systems GmbH and irretrievably deleted after 8 hours.

3.5 Special categories of personal data

La-Well Systems GmbH expressly points out that the whiteboard is not intended for diagnostic purposes. Nevertheless, technical and organizational measures cannot exclude the possibility that customers or their patients/guests may exchange special categories of personal data via the whiteboard.

When using the chat and desktop sharing within the CGM Video consultation, 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 desktop sharing is transmitted peer-to-peer and not stored.

3.6 Data of patients/guests

The name and access code of a patient/guest with whom the customer conducts a CGM Video consultation are transmitted to the server of La-Well Systems GmbH. Name and access code are stored until the customer deletes these details in his account or the customer's account is deleted after termination of the contract. Due to the lack of further information, the name of a patient/guest does not allow conclusions to be drawn about a specific natural person.

If the access code is sent to the patient/guest by e-mail, the e-mail address is transmitted to the server of La-Well Systems GmbH. The e-mail address will then be deleted immediately.

If the access code is sent to the patient/guest by text message, the cell phone number is transmitted to the Message Networks GmbH server for sending the access code. The cell phone number is stored in anonymous form for three months for the purpose of tracking.

When accessing the website with the login form via elvi.visite.de / clickdoc.elvi.de / beratung.elvi.de by customers and their patients/guests, the company Cloudflare, Inc. bundles the requests to the server and stores static files of the website. This serves to speed up the construction of the website. Thereby, the access data and the signalling data (IP addresses) of the customers and their patients/guests are transmitted to Cloudflare Inc. The data is stored for one year after the last use. Processing and storage are usually carried out in computer centers in the EU, provided that the customer and their patients/guests are located in the EU. Deviations may occur if all Cloudflare computer centers in a country fail and the geographically closest computer center is located outside the EU or one of the participants is located outside the EU.

The use of the company Cloudflare refers only to the login process and in no way affects the execution of the video consultation.

The harmlessness of using Cloudflare for the login process for the CGM Video consultation was confirmed by tekit Consult Bonn GmbH (TÜV Saarland). Cloudflare Inc. is recommended by the Federal Office for Information Security as a qualified DDoS-Mitigation service provider and is a Privacy Shield participant (<https://www.privacyshield.gov/participant?id=a2zt0000000GnZKAA0>).

To establish the video session by means of the CGM Video consultation, the IP address of the customer and that of his conversation partners are transmitted to the server of La-Well Systems GmbH. The IP address is not stored persistently.

3.7 Special campaign due to the corona virus 2020

Due to the spread of the corona virus, La-Well Systems GmbH and CompuGroup Medical SE are providing doctors in Germany with free licenses for the CLICKDOC video consultation for a limited period. The service can be used via <https://clickdoc.elvi.de>. All customers who register for the CLICKDOC video consultation during the campaign period (starting on February 29, 2020) via www.elvi.de or https://www.cgm.com/de/corona/kostenlose_clickdoc_video_sprechstunde.de.jsp automatically take part in the special campaign due to the coronavirus 2020. They will receive a free license for the CLICKDOC video consultation during the campaign period. The campaign period is determined by La-Well Systems GmbH. At the end of the campaign period, La-Well Systems GmbH has the right to deactivate the customer's license. At the end of the promotion period, the customer is not entitled to continue using his license free of charge, but may continue to use it at the currently valid tariffs with costs. For coordination regarding the further use of the license with costs or deactivation of the license, the registration data (first name, last name, e-mail address, name of the doctor's office, telephone number) will be transmitted to CompuGroup Medical Deutschland AG

Business Unit CLICKDOC Germany

Maria Trost 21 | 56070 Koblenz

Represented by the Board of Directors: Dr. Ralph Körfggen, Dr. Eckart Pech

Chairman of the Supervisory Board: Frank Gotthardt.

By completing the registration, the Customer agrees to this above-mentioned transfer of data to CompuGroup Medical Deutschland AG. In addition, he agrees to being contacted by CompuGroup Medical Deutschland AG or by La-Well Systems GmbH by e-mail or phone as mentioned above.

4 Use of cookies within the software

No cookies are used in the CGM Video consultation.

5 Transfer of data to third countries

No Transfer of data to third countries

6 Commitment to confidentiality, data protection training

We restrict access to contract data, protocol data, and data on technical operations to employees and contractors of La-Well Systems GmbH and CGM, for whom this information is absolutely necessary in order to provide the services from our contract. These persons are bound by compliance with this data protection declaration and confidentiality obligations (GDPR, §203 German Criminal Code). Violation of these confidentiality obligations can be punished by termination and criminal prosecution.

The employees are regularly trained in data protection.

7 Security measures / avoidance of risks

La-Well Systems GmbH 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 contract data or data for technical operation.

8 Technical and organizational measures

To ensure data security, La-Well Systems GmbH in cooperation with CompuGroup Medical SE regularly checks the state of the art. For this purpose, typical damage scenarios are determined and then the need for protection of individual personal data is derived and divided into damage categories. A risk assessment is also carried out.

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

- **Backup / Data protection**
To prevent the loss of data, the data is backed up regularly.
- **Privacy by design**
La-Well Systems GmbH 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 need to be implemented only 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 La-Well Systems GmbH are already preset in a data protection-friendly manner when delivered, so that only those personal data are processed that are necessary for the intended purpose.

The initial setting in the account of a customer of the CGM Video consultation is that the customer is not visible in the contact search and thus cannot be found by other customers of the CGM Video consultation or called by video. 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 La-Well Systems GmbH 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 exclusively by post.

- **Remote maintenance**

In exceptional cases it may occur that employees or contractors of La-Well Systems GmbH have to access customer data. There are central regulations of La-Well Systems GmbH 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 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 according to the 4-eye principle.
- Recording of the sessions is prohibited.

9 Rights of data subjects

Personal data of the customer

You have the right to information about your stored personal data as well as the right to correction, restriction of processing, objection, data portability, blocking, or deletion of this data.

You have the right to revoke the consents granted by La-Well Systems GmbH at any time with effect for the future.

You also have the right to complain to the data protection supervisory authority responsible for you if you believe that we are not processing your personal data correctly.

We commit ourselves to delete all contract data, all protocol data, and all data for technical operation after termination of your contract without being asked.

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

10 Enforcement

La-Well Systems GmbH regularly and consistently checks compliance with these data protection regulations. If La-Well Systems GmbH receives formal complaints, it will contact the author regarding his concerns to resolve any complaints regarding the use of personal information. La-Well Systems GmbH undertakes to cooperate with the relevant authorities, including data protection supervisory authorities, to this end.

11 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 substantial, we will issue a more detailed notification. Each version of this data protection declaration is to 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 La-Well Systems GmbH.

12 Responsible for La-Well Systems GmbH

Managing Directors: Mr. Christoph Brill and Mr. Klaus Donhauser

La-Well Systems GmbH
Hartwig-Mildenberg-Straße 5-9
32257 Bünde

Data protection declaration for the CGM Video consultation of La-Well Systems GmbH / a company of CompuGroup Medical SE



Contact details:

E-mail: info.la-well.de@cgm.com

Phone: 05 22 3 - 189 35 00

13 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

HansJosef.Gerlitz@cgm.com

14 Responsible supervisory authority

For La-Well Systems GmbH

the State Commissioner for Data Protection and Freedom of Information
North Rhine-Westphalia

Kavalleriestraße 2-4

40213 Düsseldorf

is responsible as the supervisory authority.