

Declaration of consent to data processing (DSGVO)

Privacy policy for Patient Care

We have been helping people to maintain or regain their freedom of movement since 1919. For us, digitalising the treatment process means protecting not only your physical freedom of movement, but also your personal data. It is therefore important to us to inform you about what personal data we collect, how this data is used and what your options are in this regard.

The overall success of Ottobock depends not only on creating a global network where information can flow freely between Ottobock companies, employees, customers and patients, but above all on ensuring personal data is kept confidential and handled safely. Trust is an element of the individual freedom and independence of our patients, and also what motivates us to offer a groundbreaking portfolio of high quality.

Responsible party:

Pohlig GmbH
Grabenstätter Straße 1, 83278 Traunstein, Germany

Data Protection Officer:

DP Dock DPO Services GmbH, Mr Wolfgang v. Sandersleben,
pohlig@dp-officer.com

Providing your treatment and follow-up care:

In the following, we would like to inform you about the categories of data we process when providing your treatment and follow-up care and how we process the data.

Processed categories of data:

For example, we may process the following categories of personal data:

- Contact information
 - First name, last name
 - Address
 - E-mail address
 - Phone number
- Information on specific topics
 - Type of service provided (prosthetics, orthotics, Human Mobility, rehabilitation technology and orthopaedic footwear specialism)
 - Specific treatment (e.g. adjusting a hand prosthesis)
 - X-rays
 - Serial number of your device, if applicable
- Further information
 - Date and time of providing the service

You are not obliged to disclose your personal data. However, we cannot provide our services unless you do so.

Purposes of data processing:

These categories of personal data are processed for the following purposes in particular:

Inclusion in the master data management system

- Communication with you (e.g. for follow-up care)
- Provision of our services (including treatment, follow-up care for the purposes of your healthcare)
- Order processing
- Preparing quotes, confirming orders and invoicing
- Business development
- Exercise or defence of legal claims
- Communication with funding parties and billing agencies

Legal basis:

Processing your personal data is necessary for the performance of the treatment contract and for entering into such a contract (Article 6, paragraph 1(b) of the GDPR). Processing your personal data is necessary for our business development on account of our legitimate interest in safeguarding our economic future (Article 6, paragraph 1(f) GDPR).

Insofar as we process personal data concerning your health for the purposes of your healthcare (treatment and follow-up care, administration), this processing is carried out on the basis of Art. 9 para. 2(h) GDPR in conjunction with Art. 22 para. 1(1)(b) of the Federal Data Protection Act (BDSG). In the event that we are required to process your personal data in order to defend against or assert legal claims, this shall be done on the basis of Article 9, paragraph 2(f) GDPR.

Storage periods or criteria for determination:

We delete your data when it is no longer required for the purposes of preparing and providing treatment, follow-up care and invoicing, and no other legal bases, in particular statutory or contractual retention periods, apply (retention periods generally last 10 years after the last instance of processing).

Training, surveys, research, product development and quality improvement:

In the following, we would like to inform you about the categories of data we process for training, research, product development and quality improvement as part of the modernisation of our products and services within the Ottobock Group and how we process the data.

Processed categories of data:

For example, we may process the following categories of personal data:

- Contact information
 - Pseudonymised customer number
 - First name, last name
 - Address
 - E-mail address
 - Phone number
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- Information on specific topics
 - Type of service provided (prosthetics, orthotics, Human Mobility, rehabilitation technology and orthopaedic footwear specialism)
 - Specific treatment (e.g. adjusting a hand prosthesis)
 - Type number of your device, if applicable
 - State of health of the patient, e.g. etiology, location and intensity of pain, mobility in different joints
 - Information about the patient's habitat and needs
 - Information on the course of treatment, such as date, clinic, etc.
 - If applicable, components that have been fitted/tested
 - If applicable, answers from clinical questionnaires
 - If applicable, results of functional tests
- Further information
 - Date on which the service was provided
 - If applicable, demographic data such as gender, year of birth and weight
 - Your e-mail address to send you surveys

You are not obliged to disclose your personal data. However, we cannot process your data for the above purposes unless you do so.

Purposes of data processing:

These categories of personal data are processed for the following purposes in particular:

- Training and further education of our qualified personnel
- Training and further education of members of other healthcare professions, in particular O&P professionals and sales partners (Ottobock-certified O&P professionals) within the Ottobock Group, in order to globally improve the quality of treatment
- Health research by means of surveys and analysis of the clinical effectiveness of existing solutions
- Product development to modernise our products and services within the Ottobock Group (e.g. mobile apps, technical applications to improve treatment)

Legal basis:

We process your personal data on the basis of your consent (Article 6, paragraph 1 lit. a GDPR). We process your data concerning health on the basis of your consent for special categories of personal data (Article 9, paragraph 2(a) GDPR). If you have entered into a contract with us to be a demo user for product development tests, we will process the data you enter there – but not your data concerning health – in order to perform the contract (Article 6, paragraph 1(b) GDPR).

Storage periods or criteria for determination:

We delete your data when it is no longer required for the purposes of training, research and product development pursued by us and no other legal bases, in particular statutory or contractual retention periods, apply (retention periods generally last 10 years after the last instance of processing)

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Compliance with legal obligations:

As part of the performance of the contract, we are subject to legal obligations regarding data processing. These obligations are listed below.

Processed categories of data:

- Contact information
 - First name, last name
 - Address
 - E-mail address
 - Phone number
- Information on specific topics
 - Type of service provided (prosthetics, orthotics, Human Mobility, rehabilitation technology or orthopaedic footwear specialism)
 - Specific treatment (e.g. adjusting a hand prosthesis)
 - X-rays
 - Type number of your devices, if applicable
- Further information
 - Date and time of providing the service

You are not obliged to disclose your personal data. However, we cannot provide our services unless you do so.

Purposes of data processing:

These categories of personal data are processed for the following purposes in particular:

- To comply with statutory retention obligations
- To comply with statutory reporting requirements to the police or health authorities

Legal basis:

Data processing is necessary for compliance with legal obligations (Article 6, paragraph 1(c) GDPR).

Storage periods or criteria for determination:

We are legally required to retain treatment records, commercial correspondence and documents that are relevant for tax purposes for a period of up to 10 years from the end of the treatment or the final transaction.

From whom we receive your data:

We collect the relevant data – wherever possible – from you personally. In some cases, however, we may also receive your personal data from other healthcare organisations (those involved in your initial/pre-treatment, for example), i.e. from doctors (e.g. your local surgery, specialist surgeries or ambulatory healthcare centres). As part of our patient care, this personal data is combined with your other data to form consistent and uniform documentation.

Who we share data with:

Internally, we only share your personal data with the departments that require it for the above-mentioned purposes and that are responsible for ensuring the global quality of treatment. This also applies to the transfer of data to Ottobock companies outside the EU (due to different national laws, a similar level of data protection cannot always be guaranteed). Ottobock has implemented contractual and internal security measures to address any risks regarding different levels of data protection.

Processors, companies and billing agencies that are commissioned by Ottobock to process data within the applicable legal framework (Article 28 GDPR – Processor). Ottobock remains responsible for the protection of your data in such cases. Our processors are carefully selected, bound by our guidelines and regularly audited by us. We only commission processors who offer sufficient guarantees that suitable technical and organisational measures are implemented to ensure that processing is done in accordance with the requirements of the GDPR and that your rights are protected.

Private entities that provide services for you under their own responsibility or jointly with Ottobock and/or as part of a contract with Ottobock. This is the case if you commission services from private entities from us, if you consent to their involvement or if we involve private entities on the basis of legal authorisation. If we nevertheless disclose your data to third parties in the course of processing, transfer it to them or otherwise grant them access to the data, this is also done exclusively on the basis of one of the above-mentioned purposes and legal bases. Third parties include, for example, other companies in the Ottobock Group, statutory and private health insurance providers, accident insurance providers, collection service providers, doctors and manufacturers/suppliers of orthopaedic devices.

Government entities to which we transfer certain data due to legal obligations. These include health authorities and tax offices, for example.

Transfer of personal data to countries outside the EU and EEA:

We may transfer your data to entities based outside the European Union and/or the European Economic Area. In this case, we ensure prior to the transfer that, except in exceptional cases permitted by law, either the recipient has an adequate level of data protection (e.g. through an adequacy decision of the European Commission, suitable guarantees such as the agreement of so-called EU standard data protection clauses of the European Commission with the recipient) or you have given your express consent. Information about suitable guarantees is available from the Global Data Privacy Officer.

No profiling:

We do not carry out automated individual decision-making on your personal data.

Revoking your consent:

You can revoke your consent at any time in writing to the above-mentioned company or by e-mail to info@pohlig.net. The revocation applies only to future data processing. The legality of the data processing carried out up to the point of revocation remains unaffected by the revocation.

Your rights:

You have the right

- To request **confirmation** as to whether we are processing your personal data; if this is the case, you have the right to **information** regarding this processing (Art. 15 GDPR)
- To request the **correction** or completion of incorrect or incomplete data (Art. 16 GDPR)
- To **revoke** your consent at any time with effect for the future (Art. 7 paragraph 3 GDPR)
- To request the **erasure** of data in certain cases (Art. 17 GDPR)
- To request the **restriction** of processing under certain conditions (Art. 18 GDPR)
- To **data portability** under certain conditions, i.e. you can receive the data you have provided to us in a structured, commonly used and machine-readable format or have it transmitted to another controller (Art. 20 GDPR)
- To lodge a **complaint** with a **supervisory authority** (Art. 77 GDPR)

Right to object (Art. 21 GDPR)

Please address your right to object to: info@pohlig.net

You have the right to object, on grounds arising from your particular situation, at any time to processing of personal data concerning you which is based on Art. 6 para. 1(f) GDPR. We will then no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the establishment, exercise or defence of legal claims.

Where personal data is processed for marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing purposes. If you object to the processing for marketing purposes, the personal data will no longer be processed for such purposes.

Amendment of this privacy policy:

We revise this privacy policy in the event of changes that make this necessary. The most recent version is always available in our Patient Care Center.

Privacy policy date: February 2024