

# Privacy Policy of arzthaus.ch Ltd and AH Betriebsgesellschaft Ltd

## 1 Why have we developed this Privacy Policy?

Under the Data Protection Act, we are obligated to inform you about the processing of your personal data.

## 2 Who is responsible for the data processing?

Either arzthaus.ch Ltd, of Zeughausgasse 22 9000 St. Gallen ("Arzthaus"), or AH Betriebsgesellschaft Ltd, of Goethestrasse 14, 8001 Zurich ("AH Betriebsgesellschaft"); Arzthaus and AH Betriebsgesellschaft jointly (the "AH Company/Companies" or "we"), is responsible for the collection, processing and use of your personal data, depending on which of the two companies determines the means and purposes of the data processing. Often it is both companies individually. For establishing contact and in case you have any questions, J. Olsson will be happy to assist you via email at [info@arzthaus.ch](mailto:info@arzthaus.ch) or by phone at 044 244 50 70.

## 3 Who does this Privacy Policy apply to?

This Privacy Policy applies to all natural persons ("you") whose personal data is processed by an AH Company, except for the processing of personal data in connection with medical services provided by Arzthaus ("doctor-patient relationship"). This data is subject to professional secrecy or a professional duty of confidentiality. The Data Protection Act therefore provides that patients do not have to be informed about the processing of this personal data. This Privacy Policy therefore applies to all processing of personal data outside the doctor-patient relationship. The Privacy Policy applies regardless of the channels you and the AH Companies interact through or the transactions affected by the processing (website, events, applications, etc.).

The Privacy Policy therefore covers, in particular, the following categories of persons:

- persons visiting a website of AH Betriebsgesellschaft;
- visitors to the premises of Arzthaus who are not patients;
- persons who receive marketing information from an AH Company;
- referring bodies of Arzthaus who are natural persons, or in the case of legal persons, their points of contact;

- persons who participate in customer events and other public events of an AH Company;
- contact persons of the suppliers and service providers of an AH Company, e.g. laboratories, diagnostic centres;
- persons applying for positions at an AH Company

## **4 What personal data do we process?**

The personal data we process includes but is not limited to the following:

### **4.1 Master data**

Master data is basic personal data, e.g.

- name
- title
- address
- date of birth
- contact details (e-mail & postal address) and bank details
- gender (where necessary)

We process these, e.g. in the context of implementing a contract or processing a job application.

### **4.2 Contract data**

In addition to the master data, contract data is collected prior to the conclusion of the contract, upon conclusion of the contract and during the implementation of the contract, e.g.

- for enquiries about products and services that you or your company offer or provide
- regarding the services provided by you or your company for an AH Company
- regarding job applications; in this case, besides the personal data resulting from the documents submitted by you, the AH Company will also process references obtained.

### **4.3 Marketing data**

If you attend events of an AH Company or use other information channels outside the doctor-patient relationship, the AH Company may process personal data for marketing purposes. This is the case, for example, if you

- register for an event or
- visit a website of AH Betriebsgesellschaft.

### **4.4 Communication data and technical data**

AH Betriebsgesellschaft collects personal data including but not limited to the following in the form of communication data relating to the use of our websites:

- IP address
- date and time of the request
- time zone difference to Greenwich Mean Time (GMT)
- content of the request (specific page)
- access status/HTTP status code
- volume of data transferred in each case
- website from which the request came
- browser
- operating system and its interface
- language and version of your browser software

The processing of personal data through the use of cookies is described in Section 8.

For security purposes, we make video recordings in the entrance area of some practices. The video cameras are marked. The images are geographically limited to this area.

## **5 Purpose of processing personal data**

### **5.1 Implementing contracts**

We process personal data, including but not limited to master data, to fulfil the contracts concluded with us (e.g. when delivering blood samples to the contact details of the laboratory) or to initiate a contract (e.g. when we respond to an offer from a supplier).

## **5.2 Communicating with you**

In particular, we use master, marketing and contract data to communicate with you (e.g. to submit a request to your customer service or in the event of warranty claims).

## **5.3 Marketing**

We process your personal data, primarily master data but also contract data, for marketing purposes, e.g. to draw your attention to events.

## **5.4 Improving the website and determining the load on servers**

AH Betriebsgesellschaft uses your communication data to analyse the use of the website, to statistically evaluate visits to the website, to present the website to you in an effective and appealing manner, to identify errors, to continuously improve the website and to determine the load on the web servers (see also the information in Section 10).

## **5.5 Ensuring security**

We also process personal data (e.g. communication data) for security purposes, whether for IT security or to prevent theft or fraud and for the purpose of producing evidence. This includes, for example, video recording in the entrance areas of Arzthaus or monitoring our IT infrastructure to prevent and defend against cyber-attacks.

## **5.6 To comply with legal requirements and safeguard rights**

Finally, we process personal data to comply with legal obligations, e.g. relating to the retention of business records, for tax purposes or to enforce claims to which we are entitled under contracts. For this purpose, we mainly use master and contract data.

## **6 Deletion of personal data**

We will process and store your personal data for as long as necessary for the purpose of the processing or for purposes compatible therewith, for as long as we have a legitimate interest in its storage or for as long as we are legally obligated to retain it. For example, we are obligated to keep accounting records for ten years. The video recordings referred to in Section 4.4 are deleted after 24 hours.

## **7 Who do we disclose your personal data to?**

We disclose personal data to third parties for the purposes listed in Section 5. These include primarily the following types of recipients:

- carriers entrusted with the transport of laboratory findings, products or the like
- service partners in connection with the provision of services and warranties
- credit institutions entrusted with processing payments
- organisers for holding conferences and events
- fiduciary contractors for the provision of administrative services (such as bookkeeping)
- IT contractors for the provision of IT support/services
- IT service providers in connection with a visit to our website

## **8 Do we also disclose your personal data to recipients in a third country?**

Your personal data is normally processed in Switzerland and the European Economic Area (EEA). The countries of the EEA provide adequate protection for personal data. As part of outsourced data processing, personal data may, in accordance with Section 7, be transferred on a case-by-case basis to IT companies located in a third country that does not guarantee adequate data protection. In this case, we or the relevant processor will ensure compliance with appropriate data protection by the recipient, normally by agreeing to EU standard contractual clauses.

## **9 From which third parties do we receive personal data about you?**

We process personal data that we receive from third parties in the following cases: Personal data relating to candidates recommended to us by recruitment agencies.

## **10 Website-specific information of AH Betriebsgesellschaft**

The following information also applies when using the websites of AH Betriebsgesellschaft (including but not limited to [www.arzthaus.ch](http://www.arzthaus.ch)) with regard to cookies and other tools used. Further information concerning the use of the websites (such as the categories of personal data processed or the purpose of the processing) is set out above.

### **10.1 Cookies**

Our website uses cookies. Cookies are short data packages that are stored permanently or temporarily on the user's device when visiting the website. Cookies are utilised to analyse the use of the website in the context of statistical evaluations and to continuously

improve the website. The cookies used on the website record the location of the user as well as the third-party page from which the user has navigated to the website. The user can disable any or all cookies in his or her browser settings at any time. However, if cookies are disabled, all of the website's features may no longer be available.

## **10.2 Google Analytics**

We also use Google Analytics on our website, a web analysis service provided by Google Ireland Limited ("Google"), of Gordon House, Barrow Street, Dublin 4, Ireland. The information generated by Google Analytics about your use of this website may be transmitted to and stored on one of Google's servers in the USA. However, your IP address will be shortened beforehand by Google within an EEA country and thus made anonymous. Google will use this information on our behalf in order to analyse your use of our website, to compile reports on the website activities and to provide us with additional services related to the use of the website and the internet. The IP address transmitted from your browser in connection with Google Analytics is not combined with other data held by Google. In this case as well, you can prevent cookies from being stored by configuring your browser software accordingly. Furthermore, you can prevent the data generated by the cookie and related to the use of this website (including your IP address) from being collected and processed by Google by downloading and installing the browser plugin available at <http://tools.google.com/dlpage/gaoptout?hl=en>.

## **10.3 Use of Google Maps**

We enable you to view and use geo-specific data from Google Ireland Limited ("Google"), of Gordon House, Barrow Street, Dublin 4, Ireland, via an interface. Before you can use the content provided by Google, you must first declare to Google whether you accept or reject the cookies set by Google. For more information on the personal data processed by Google, please refer to Google's privacy policy. The controller for the processing of this personal data collected by Google is Google.

## **10.4 Social media plug-ins**

We use social media plug-ins from Facebook and LinkedIn on our website. Personal data is transferred to the operators of the social media if you are logged into the corresponding social media. Before you can use the content provided by the social media operators, you must first explain to them whether you accept or reject the cookies they set. For more information on the personal data processed by the social media operators can be found in their privacy policy, which is presented to you at the outset. The respective social media operators are responsible for the processing of this personal data.

## **11 What rights do you have in relation to us?**

In particular, you have the right to obtain information about your stored personal data, to correct it or to request its deletion, provided that the applicable legal requirements are met. To do so, please contact us (section 2).

## **12 Amendments to the Privacy Policy**

We amend this Privacy Policy from time to time. The version published on the website is the currently valid version.