Privacy Policy

Introduction

AIRAdoc GmbH, Am Biopark 13, 93053 Regensburg, including its subsidiaries (collectively referred to below as the „Company“, „we“ and „us“), attaches the highest priority to the protection of your personal data.

Where we act as controller within the meaning of the GDPR, we would like to provide you with comprehensive information about our data protection practices in accordance with Art. 13 GDPR. This includes any processing of personal data on our marketing websites and the processing of user data within our AIRAdoc product. These processing activities are described in detail in Parts B and C. For processing activities where we act solely as processor, our processing agreement under Art. 28 GDPR concluded with the customer shall apply.

The implementation of the EU General Data Protection Regulation (Regulation (EU) 2016/679; „GDPR“) imposed additional obligations on us as controllers to protect the personal data of data subjects. Below, we also refer to you as the data subject, „user“, „customer“ or „you“. We are also subject to the further provisions of the German Federal Data Protection Act (Bundesdatenschutzgesetz, „BDSG“), which specifies and supplements the GDPR.

Where we determine the purposes and means of processing personal data, alone or jointly with others, we are in particular obliged to provide transparent information about the nature, scope, purpose, duration and legal basis of the processing (in accordance with Arts. 13 and 14 GDPR). This Privacy Policy informs you how we process your personal data.

This Privacy Policy is divided into three parts. Part A (General Provisions) informs you about the legal foundations of data protection. Part B (Marketing Websites) provides specific information about data protection matters relevant to the use of our marketing websites. Part C (AIRAdoc) provides specific information about data protection matters relevant to the use of the AIRAdoc software we provide. Annex 1 provides information about the processors used for certain processing activities.

A. General Provisions

1. Definitions

The following definitions under Art. 4 GDPR apply to this Privacy Policy:

„Personal data“ (Art. 4 no. 1 GDPR) means any information relating to an identified or identifiable natural person („data subject“). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to that person’s physical, physiological, genetic, mental, economic, cultural or social identity. Identifiability may also result from combining different information or from additional knowledge. The form of the information (photos, videos, audio recordings, etc.) is irrelevant.

„Processing“ (Art. 4 no. 2 GDPR) means any operation performed on personal data, whether or not by automated means. This includes collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of data, and changing the original purpose of the data.

„Controller“ (Art. 4 no. 7 GDPR) means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

„Processor“ (Art. 4 no. 8 GDPR) means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller, in particular in accordance with the controller’s instructions (e.g. an IT service provider). For data protection purposes, a processor is not a third party.

„Third party“ (Art. 4 no. 10 GDPR) means a natural or legal person, public authority, agency or body other than the data subject, the controller, the processor and persons who, under the direct authority of the controller or processor, are authorised to process the personal data. This includes other legal entities belonging to the same group.

„Consent“ (Art. 4 no. 11 GDPR) of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which they signify agreement to the processing of personal data relating to them, by a statement or by a clear affirmative action.

„Special categories of personal data“ (Art. 9(1) GDPR) are data revealing, for example, racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership. They also include genetic data, biometric data for the unique identification of a natural person, health data and data concerning a person’s sex life or sexual orientation. Special legal requirements apply to the processing of these data, as noted at the relevant points below.

2. Controller Details

The controller responsible for processing your personal data within the meaning of Art. 4 no. 7 GDPR is AIRAdoc GmbH:

AIRAdoc GmbH

Am Biopark 13

93053 Regensburg

Managing Director: Prof. Dr. Thomas Bolz

Email: info@airadoc.com

For further information about our company, please refer to the legal notice on our website.

3. Data Protection Officer

Our Data Protection Officer is available to answer questions about data protection at any time:

Jonathan Bollig

Am Biopark 13

93053 Regensburg

Email: datenschutz@airadoc.com

4. Legal Bases for Processing

Processing personal data is generally lawful only if a legal basis exists. Such a legal basis may in particular be:

• Art. 6(1)(a) GDPR („Consent"): The data subject has freely, specifically, informedly and unambiguously consented to a specific processing activity.

• Art. 6(1)(b) GDPR: The processing is necessary for the performance of a contract or for taking steps at the request of the data subject before entering into a contract.

• Art. 6(1)(c) GDPR: The processing is necessary for compliance with a legal obligation to which the controller is subject.

• Art. 6(1)(d) GDPR: The processing is necessary to protect the vital interests of the data subject or another natural person.

• Art. 6(1)(e) GDPR: The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.

• Art. 6(1)(f) GDPR („Legitimate interests"): The processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party, except where those interests are overridden by the interests or fundamental rights and freedoms of the data subject.

For each processing activity we carry out, we state the applicable legal basis below. A processing activity may be based on more than one legal basis.

5. Data Erasure and Retention Period

Unless an explicit retention period is specified, your personal data shall be erased or blocked as soon as the purpose or legal basis for its storage no longer applies. Storage beyond the purposes and legal bases set out in this Privacy Policy may be necessary in the event of actual or threatened legal disputes or where storage is required by statutory provisions (e.g. § 257 HGB, § 147 AO). In such cases, the legal basis for processing is Art. 6(1)(f) GDPR or Art. 6(1)(c) GDPR, as applicable.

6. Data Security

We implement appropriate technical and organisational security measures to protect your data against accidental or deliberate manipulation, loss, destruction or unauthorised access (e.g. TLS encryption for our website). In doing so, in accordance with Art. 25(1) GDPR, we take into account the state of the art, the implementation costs, the nature, scope, context and purposes of processing, as well as the varying likelihood and severity of the risk to the rights and freedoms of natural persons. Our security measures are continuously adapted to technological developments. Further information is available on request from our Data Protection Officer (A.3) or in the document describing our technical and organisational measures on the marketing websites.

7. Engagement of Processors

Like any larger company, we use external service providers in Germany and abroad (e.g. in IT, logistics, telecommunications and marketing). They act exclusively on our instructions and have been contractually obliged to comply with data protection requirements in accordance with Art. 28 GDPR.

8. Transfers to Third Countries

As part of our business relationships, your personal data may be transferred to companies in third countries outside the European Economic Area (EEA). Such processing takes place exclusively to fulfil contractual and business obligations and to maintain our business relationship. Details of each transfer are explained at the relevant points in this Privacy Policy.

For some third countries, the European Commission has adopted an adequacy decision under Art. 45 GDPR. A list of those countries and copies of the decisions are available at http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.html. In other third countries to which personal data are transferred, there may not be a comparable level of data protection. In such cases, we ensure appropriate protection by means such as binding corporate rules, EU standard contractual clauses, certificates or recognised codes of conduct. For further information, please contact our Data Protection Officer (A.3).

9. Automated Decision-Making and Profiling

If we carry out automated decision-making, including profiling, we shall inform you separately about this and about the underlying logic, scope and intended effects for the data subject.

As a rule, we do not use your personal data for automated decision-making or profiling.

10. No Obligation to Provide Personal Data

We do not make the conclusion of contracts conditional on your providing personal data in advance. In principle, there is no statutory or contractual obligation to provide us with your personal data. However, we may only be able to provide certain offers or services to a limited extent, or not at all, if you do not provide the required data.

11. Statutory Disclosure Obligations

We may be legally required to transmit lawfully processed personal data to third parties, in particular public authorities (under Art. 6(1)(c) GDPR).

12. Your Rights

As a data subject, you have in particular the following rights regarding your personal data. You may exercise these rights at any time using the contact details in section A.2:

• Right of access (Art. 15 GDPR): You may request information about the data we process, the purposes of processing, categories of data, recipients, retention periods, your rights and other information.

• Right to rectification (Art. 16 GDPR): You may request the immediate correction of inaccurate data or completion of incomplete data.

• Right to erasure (Art. 17 GDPR): Under certain conditions, you may request erasure of your data.

• Right to restriction of processing (Art. 18 GDPR): Under certain conditions, you may request restriction of processing of your data.

• Right to data portability (Art. 20 GDPR): You may request to receive your data in a structured, commonly used and machine-readable format or have it transmitted to another controller.

• Right to object (Art. 21 GDPR): You may object to processing based on Art. 6(1)(e) or (f) GDPR.

• Right to withdraw consent (Art. 7(3) GDPR): You may withdraw consent at any time, prohibiting processing based on that consent for the future. The lawfulness of processing carried out before withdrawal remains unaffected.

• Right to lodge a complaint (Art. 77 GDPR): You may lodge a complaint with a data protection supervisory authority, for example the Bavarian State Office for Data Protection Supervision (BayLDA), Promenade 18, 91522 Ansbach, Germany, email: poststelle@datenschutz-bayern.de.

13. Cookies

Cookies are small text files stored by your browser on your device. The entity setting a cookie can thereby obtain certain information. Cookies cannot execute programs or transfer malware to your device. Their use serves to improve the user-friendliness and efficiency of our online offering. Cookies may contain information that enables identification of the device being used. Other cookies store only configuration settings that do not relate to an identifiable person. Cookies do not directly identify the user.

Cookies are classified according to their storage period (temporary session cookies versus permanent cookies) and their functionality:

• Technical cookies: These are indispensable for navigation and the basic functionality of our website and ensure its security. They neither collect marketing information nor record your browsing history.

• Performance cookies: These collect pseudonymous data about your use of our website, pages visited and any malfunctions. They are used exclusively to optimise our offering and analyse user interests.

• Advertising and targeting cookies: These enable personalised advertising on our website or through third-party providers and the measurement of the success of such offerings. The maximum storage period is 13 months.

• Interaction cookies: These improve communication between our website and external services, such as social networks. Here too, the maximum storage period is 13 months.

Any use of cookies that is not strictly technically necessary constitutes a processing activity relevant under data protection law and is permitted only with your express and active consent under Art. 6(1)(a) GDPR. This applies in particular to advertising, targeting and interaction cookies. Personal data processed through cookies may also be disclosed to third parties only with your express consent under Art. 6(1)(a) GDPR. You may withdraw this consent at any time through our cookie management system.

For certain cookies, the legal basis may also arise from Art. 6(1)(b) to (f) GDPR.

14. Updates to this Privacy Policy

We regularly review this Privacy Policy and adapt it to changes in data protection law and to technical or organisational developments. We publish changes in particular on our website at www.airadoc.com. This Privacy Policy is dated October 2026.

B. Marketing Websites

1. Description of Functionality

Information about our company and the services we offer is available in particular at www.airadoc.com and its associated subpages (collectively, the „Marketing Websites“). Personal data may be processed when you visit our Marketing Websites.

2. Personal Data Processed

Where the processing described below is based on Art. 6(1)(f) GDPR, the purposes stated also constitute our legitimate interests.

a. Informational Use

When using our Marketing Websites purely for information, we process in particular the following personal data.

Log Data

- Context and scope

Each time our Marketing Websites are accessed, a temporary and pseudonymised log record (so-called server log files) is stored containing the following information:

- Referrer URL (the page from which the request originated)
- Name and URL of the requested page
- Date and time of access
- Description of the type, language and version of the browser used
- Shortened IP address of the requesting computer (pseudonymised)
- Amount of data transferred
- Operating system
- Access status/HTTP status code
- GMT time-zone difference
- Purpose and legal basis

The log data are processed for statistical purposes and to improve our website, in particular its stability and security (legal basis: Art. 6(1)(f) GDPR).

- Duration of processing

A.5 applies.

- Categories of recipients

Service providers for operating our website and processing the stored data (e.g. data centres and IT security providers).

- Transfers to third countries

Data may in some cases be transferred to sub-processors of the service providers used for analytics and hosting. Further information and the legal classification of the transfer are provided in Annex 1.

Cookies

- Context and scope

Name	Domain	Storage period	Category	Description
_ga	airadoc.com	13 months	Performance	Assigning the user to an ID (Google Analytics)
_ga_<property_id>	airadoc.com	13 months	Performance	Assigning the user to a Property ID (Google Analytics)
fs-consent-*	airadoc.com	1 month	Technically necessary	Storing cookie preferences

- Purpose and legal basis

See the „Description“ column in the overview above. A.13 also applies.

- Duration of processing

A.5 and A.12 apply.

- Categories of recipients

Recipients of performance-cookie data are our processors for analytics purposes. For the „_ga“ and „_ga_<property_id>“ cookies, these are Google and its processors. Further information and the legal classification of the transfer are provided in Annex 1.

- Transfers to third countries

Personal data collected through the „_ga“ and „_ga_<property_id>“ cookies are transferred to Google (Analytics) in third countries. Further information and the legal classification of the transfer are provided in Annex 1. Data may also be transferred to processors for analytics and hosting purposes.

b. Contacting Us

If you use our contact form, we process the personal data described below.

Contact Form Data

- Context and scope

When you use our contact forms, we process the data you submit, such as name, first name, email address and time of submission. Personal data optionally included in your message are also processed.

- Purpose and legal basis

Contact-form data are processed to handle your enquiries (legal basis: Art. 6(1)(b) or (f) GDPR). Any optional special categories of personal data included in your message are processed on the basis of implied consent under Art. 6(1)(a) GDPR or Art. 9(2)(a) GDPR.

- Duration of processing

A.5 applies.

- Categories of recipients

Processors for providing the form, transmitting the message, processing the stored data and carrying out the tasks arising from your enquiry (e.g. data centres and IT security providers).

- Transfers to third countries

Data may in some cases be transferred to hosting processors. Data are also transferred to Google (email traffic) and its processors. Further information and the legal classification of the transfer are provided in Annex 1.

3. Final Remarks

a. Social Media

We do not implement direct social-media plugins on our websites. If symbols of social-media platforms such as Facebook, Instagram or similar services appear on our website, they serve only as passive links to the websites of the respective providers.

C. AIRAdoc

1. Description of Functionality

Our AIRAdoc software supports doctors in their professional work with AI-assisted functions. The specific range of functions also depends on your configuration. Details are set out in the applicable General Terms and Conditions.

2. Personal Data Processed

Where the processing described below is based on Art. 6(1)(f) GDPR, the purposes stated also constitute our legitimate interests. No special categories of personal data are processed. Usage data may be aggregated in anonymised form for marketing purposes.

a. Basic Use

The following personal data may be processed whenever AIRAdoc is used.

Log Data

- Context and scope

Each time AIRAdoc is accessed, a temporary and anonymised log record (so-called server log files) is stored containing the following information:

- Referrer URL (the page from which the request originated)
- Name and URL of the requested page
- Date and time of access

- Description of the type, language and version of the browser used
- Shortened IP address of the requesting computer (anonymised)
- Amount of data transferred
- Operating system
- Access status/HTTP status code
- GMT time-zone difference
- Purpose and legal basis

The log data are processed for statistical purposes and to improve our product, in particular its stability and security (legal basis: Art. 6(1)(f) GDPR).

- Duration of processing

A.5 applies.

- Categories of recipients

Service providers for operating our website and processing the stored data (e.g. data centres and IT security providers).

- Transfers to third countries

None.

Cookies

- Context and scope

Name	Domain	Storage period	Category	Description
i18next	app.airadoc.com	Session	Technically necessary	Storing language preferences

- Purpose and legal basis

See the „Description“ column in the overview above. A.13 also applies.

- Duration of processing

A.5 and A.12 apply.

- Categories of recipients

Processors for hosting.

- Transfers to third countries

None.

b. Account and Settings Management

User Profile and User Settings

- Context and scope

To create and manage your user account, we request some basic information. This includes:

- First and last name
- Email address
- Speciality
- Language setting
- Sign-off used for medical letters
- Purpose and legal basis

This data are processed to register users, prepare the user account before the first login and provide product functionalities (legal basis: Art. 6(1)(b) GDPR).

- Duration of processing

A.5 applies.

- Categories of recipients

Processors hosting AIRAdoc.

- Transfers to third countries

None.

Advertising and Product Information

- Context and scope

For sending product information such as usage instructions and tutorials and for advertising purposes, we process certain personal data. All or some of the following data may be processed:

- First and last name
- Email address
- Telephone number
- Speciality
- Language setting.
- Purpose and legal basis

This data are processed for advertising purposes and for sending optional product information and are based on your explicit consent during the registration process (legal basis: Art. 6(1)(a) GDPR).

- Duration of processing

A.5 applies.

- Categories of recipients

Processors hosting AIRAdoc.

- Transfers to third countries

None.

Payment Processing

- Context and scope

We need payment information from you to process payments.

- Purpose and legal basis

This data are processed solely for payment processing (legal basis: Art. 6(1)(b) GDPR).

- Duration of processing

A.5 applies.

- Categories of recipients

Processors for AIRAdoc payment processing.

- Transfers to third countries

Transfers to third countries take place exclusively when data are transmitted to processors for payment processing. Further information and the legal classification of the transfer are provided in Annex 1.

Organisations

- Context and scope

To represent organisational structures within AIRAdoc, we process the affiliation of different users with an organisation and the identification of users as administrators of that organisation.

- Purpose and legal basis

This data are processed to provide product functionalities (legal basis: Art. 6(1)(b) GDPR).

- Duration of processing

A.5 applies.

- Categories of recipients

Processors hosting AIRAdoc.

- Transfers to third countries

None.

c. Use of the Software's Functions

Feedback Function

- Context and scope

You may voluntarily rate the quality of the documentation provided. This includes a simple selection (positive or negative) and the option to enter text.

- Purpose and legal basis

This data are processed to improve our product (legal basis: Art. 6(1)(f) GDPR).

- Duration of processing

A.5 applies.

- Categories of recipients

Processors hosting AIRAdoc.

- Transfers to third countries

None.

Creation and Use of Audio Recordings, Documents and Templates

- Context and scope

When using AIRAdoc, users regularly enter or upload personal data required for the product functions. This includes, among other things:

- Audio recordings
- Documents
- Creating, retrieving and sharing templates
- Information about the use of and access to documents and templates

This may occur at both user and organisation level.

- Purpose and legal basis

This data are processed to provide product functionalities (legal basis: Art. 6(1)(b) GDPR).

- Duration of processing

A.5 applies.

- Categories of recipients

Processors hosting AIRAdoc.

- Transfers to third countries

None.

d. Data Processing for Certification and Security Review

- Context and scope

Certification of AIRAdoc under the Medical Devices Regulation (EU) 2017/745 requires the processing of your personal data. The data processed are:

- Feedback data
- Purpose and legal basis

This data are processed for the certification of AIRAdoc and therefore for clinical applicability (legal basis: Art. 6(1)(f) GDPR).

- Duration of processing

The statutory retention and processing periods for certification apply.

- Categories of recipients

Processors hosting AIRAdoc.

- Transfers to third countries

None.

Annex 1 – Overview of Processors

Marketing Website

• 1. Google

- Name of service provider: Google LLC
- Registered office: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
- Contact details: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland
- Processing activities used: Email delivery
- Legal basis: Certification under Art. 45(1) GDPR within the EU-U.S. Data Privacy Framework. Further information is available on the Data Privacy Framework.

• 2. Stripe

- Name of service provider: Stripe, Inc.
- Registered office: 354 Oyster Point Boulevard, South San Francisco, California 94080, USA
- Contact details: dpo@stripe.com
- Processing activities used: Payment processing
- Legal basis: Certification under Art. 45(1) GDPR within the EU-U.S. Data Privacy Framework. Further information is available on the Data Privacy Framework.

• 3. HubSpot

- Name of service provider: HubSpot, Inc.
- Registered office: Two Canal Park, Cambridge, MA 02141, USA
- Contact details: Nicholas Knoop, Data Protection Officer, HubSpot, Inc., Two Canal Park, Cambridge, MA 02141, USA; privacy@hubspot.com
- Processing activities used: Contacting us
- Legal basis: Certification under Art. 45(1) GDPR within the EU-U.S. Data Privacy Framework. Further information is available on the Data Privacy Framework.

Product

• 1. Telekom

- Name of service provider: Telekom Deutschland GmbH
- Registered office: Landgrabenweg 149, 53227 Bonn, Germany
- Contact details: Dr. Claus D. Ulmer, Friedrich-Ebert-Allee 140, 53113 Bonn, datenschutz@telekom.de
- Hosting of AIRAdoc on the Open Telekom Cloud
- Categories of data subjects: As set out in Annex I of the agreement on joint controllership.
- Categories of data processed: As set out in Annex I of the agreement on joint controllership.
- Types of processing: As set out in Annex I of the agreement on joint controllership, except for use in the sense of processing with large language models.
- Purposes of processing: As set out in Annex I of the agreement on joint controllership. This processing occurs whenever AIRAdoc is used.
- Duration of processing: As set out in Annex I of the agreement on joint controllership.

• 2. Nebius

- Name of service provider: Nebius BV
- Registered office: Schiphol Boulevard 165, 1118 BG Schiphol, Netherlands
- Contact details: Data Protection Officer, Marina Benassi Coslovi, Schiphol Boulevard 165, 1118 BG Schiphol, the Netherlands. Email: privacy@nebius.com. Telephone: +31 202066970.
- LLM inference on Nebius Token Factory
- Categories of data subjects: As set out in Annex I of the agreement on joint controllership.
- Categories of data processed: As set out in Annex I of the agreement on joint controllership.
- Types of processing: Use in the sense of processing with large language models.

- Purposes of processing: Generating medical documentation directly based on the content of the data collected and recorded by the controller. This processing occurs only when the Scribe function of AIRAdoc is used.
- Duration of processing: Until completion of the LLM inference.

• 3. Scaleway

- Name of service provider: Scaleway SAS
- Registered office: 8, rue de la Ville-l'Évêque, 75008 Paris, France
- Contact details: privacy@scaleway.com

- LLM inference
- Categories of data subjects: As set out in Annex I of the agreement on joint controllership.
- Categories of data processed: As set out in Annex I of the agreement on joint controllership.
- Types of processing: Use in the sense of processing with large language models.
- Purposes of processing: Generating medical documentation directly based on the content of the data collected and recorded by the controller. This processing occurs only when the Scribe function of AIRAdoc is used.
- Duration of processing: Until completion of the LLM inference.

• 4. OVH

- Name of service provider: OVH SAS
- Registered office: OVH SAS, 2 rue Kellermann, 59100 Roubaix, France
- Contact details: OVH SAS, Data Protection Officer, 2 rue Kellermann, 59100 Roubaix, France

- Transcription
- Categories of data subjects: As set out in Annex I of the agreement on joint controllership.
- Categories of data processed: As set out in Annex I of the agreement on joint controllership.
- Types of processing: Transcription of conversation content
- Purposes of processing: Capturing conversation content required for AIRAdoc functionality. This processing occurs only when the Scribe function of AIRAdoc is used.
- Duration of processing: Until completion of the transcription.