

Privacy policy

Introduction

AIRAdoc GmbH, Am BioPark 13, 93053 Regensburg, Germany, including its subsidiaries (hereinafter collectively referred to as "the Company," "we," or "us"), takes the protection of your personal data very seriously.

Insofar as we act as a controller within the meaning of the GDPR, we would like to provide you with comprehensive information about our data protection practices in this privacy policy in accordance with Art. 13 GDPR. This includes any processing of personal data on our marketing websites as well as the processing of user data within our AIRAdoc product. These processing operations are listed in detail in sections B and C. For processing activities in which we act solely as a processor, our data processing agreement with the customer pursuant to Art. 28 GDPR applies.

With the implementation of the EU General Data Protection Regulation (Regulation (EU) 2016/679; hereinafter "GDPR"), we, as the data controller, have been assigned additional obligations to ensure the protection of the personal data of the data subjects. In the following, we also refer to you as the data subject as "user," "customer," "you," or "data subject." Furthermore, we are subject to the additional provisions of the Federal Data Protection Act (hereinafter "BDSG"), which specifies and expands the requirements of the GDPR.

In cases where we decide alone or jointly with others on the purposes and means of data processing, we are particularly obliged to inform you transparently about the nature, scope, purpose, duration, and legal basis of the processing (in accordance with Articles 13 and 14 GDPR). With this declaration (hereinafter referred to as "Privacy Policy"), we inform you about how we process your personal data.

This privacy policy is divided into three parts. [Part A](#) (General Provisions) informs you about the legal basis of data protection. [Part B](#) (Marketing Websites) provides specific information about data protection issues that are relevant when using our marketing websites. [Part C](#) (AIRAdoc) provides specific information about data protection issues that are relevant when using the AIRAdoc software provided by us. Appendix 1 provides information about the processors from third countries used for certain processing activities. Appendix 2 provides information about our processors within the EEA.

A. General provisions

1. Definitions

In accordance with Art. 4 GDPR, this privacy policy is based on the following definitions:

"Personal data" (Article 4(1) GDPR) means any information relating to an identified or identifiable natural person ("data subject"). A person is considered identifiable if they can be identified directly or indirectly, in particular by association with an identifier such as a name, an identification number, location data, an online identifier, or one or more special characteristics that express the physical, physiological, genetic, psychological, economic, cultural, or social identity of that natural person. Identifiability may also be established by linking various pieces of information or by additional knowledge. The form of the information (photos, videos, audio recordings, etc.) is irrelevant.

"Processing" (Art. 4 No. 2 GDPR) refers to any operation or set of operations performed on personal data, with or without the aid of automated processes. This includes the collection, recording, organization, 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, as well as the change of the original purpose.

"Controller" (Art. 4 No. 7 GDPR) refers to the natural or legal person, public authority, agency, or other body that, alone or jointly with others, determines the purposes and means of the processing of personal data.

"Processor" (Art. 4 No. 8 GDPR) refers to a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller, in particular on the basis of the controller's instructions (e.g. IT service providers). In the context of data protection law, a processor is not considered a third party.

"Third party" (Art. 4 No. 10 GDPR) refers to a natural or legal person, public authority, agency or other body other than the data subject, the controller, the processor and the persons who, under the direct authority of the controller or processor, are authorized to process personal data. This includes other legal entities belonging to the 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 he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

"Special categories of personal data" (Art. 9 (1) GDPR) are data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data or biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. The processing of such data is subject to different laws, which are explained in more detail in this privacy policy at the relevant points with explicit reference to these categories.

2. Information about the controller

We are the controller responsible for the processing of your personal data within the meaning of Art. 4 No. 7 GDPR:

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

If you have any questions about data protection, our data protection officer is available to assist you at any time:

Jonathan Bollig
Am BioPark 13
93053 Regensburg
Email datenschutz@airadoc.com

4. Legal basis for data processing

In principle, any processing of personal data is prohibited by law and is only permitted if one of the following justifications applies:

- Art. 6 (1) (a) GDPR ("Consent"): The data subject has voluntarily, knowingly, and unambiguously given their consent to a specific processing operation.
- Art. 6 (1) (b) GDPR: Processing is necessary for the performance of a contract or pre-contractual measures.
- Art. 6 (1) (c) GDPR: Processing is necessary for compliance with a legal obligation to which the controller is subject.

- Art. 6 (1) (d) GDPR: Processing is necessary to protect vital interests.
- Art. 6 (1) (e) GDPR: 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"): Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.

We specify the applicable legal basis for each of the processing operations we carry out below. Processing may be based on several legal bases.

5. Data deletion and storage period

Unless an explicit storage period is specified, your personal data will be deleted or blocked as soon as the purpose or legal basis for storage no longer applies. Your data is generally stored on our servers in Germany, subject to disclosure in accordance with the provisions in A.7 and A.8. Storage beyond the purposes and legal bases set out in this privacy policy may be necessary in the event of (imminent) legal disputes or if storage is required by law (e.g., Section 257 of the German Commercial Code (HGB), Section 147 of the German Fiscal Code (AO)). In this case, the legal basis for data processing is Art. 6 (1) (f) GDPR or Art. 6 (1) (c) GDPR.

6. Data security

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

7. Cooperation with processors

Like any large company, we also use external domestic and foreign service providers (e.g., in the areas of IT, logistics, telecommunications, and marketing). These service providers act

exclusively in accordance with our instructions and are contractually obliged to comply with data protection regulations in accordance with Art. 28 GDPR.

8. Data transfer to third countries

Within the scope of our business relationships, your personal data may be transferred to third-party companies that may also be located outside the European Economic Area (EEA), i.e., in third countries. Such processing is carried out exclusively for the fulfillment of contractual and business obligations and for the maintenance of our business relationship. Details of the respective transfer are explained in the relevant sections of this statement.

The European Commission certifies that some third countries have a level of data protection comparable to that of the EEA by means of so-called adequacy decisions in accordance with Art. 45 GDPR. A list of these countries and copies of the decisions can be found at http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.html. Other third countries to which personal data is transferred may not have a comparable level of data protection. In such cases, we ensure that data protection is adequately guaranteed, for example through binding corporate rules, EU standard contractual clauses, certificates, or recognized codes of conduct. For more 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 will inform you separately about this and about the underlying logic, scope, and intended effects for the data subject. As a matter of principle, 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 dependent on you providing us with personal data in advance. There is generally no legal or contractual obligation to provide us with your personal data. However, we may only be able to provide certain offers to a limited extent or not at all if you do not provide the necessary data.

11. Legal transfer obligations

Under certain circumstances, we may be subject to legal or regulatory obligations to provide lawfully processed personal data to third parties, in particular public authorities (in accordance with Art. 6 (1) (c) GDPR).

12. Your rights

As a data subject, you have the following rights regarding your processed personal data, which you can exercise at any time using the contact details provided in A.2:

- Right of access (Art. 15 GDPR): You can request information about your processed data, the purposes of processing, data categories, recipients, storage period, your rights, etc.
- Right to rectification (Art. 16 GDPR): You can request the immediate rectification of inaccurate data or the completion of your data.
- Right to erasure (Art. 17 GDPR): Under certain conditions, you can request the erasure of your data.
- Right to restriction of processing (Art. 18 GDPR): Under certain conditions, you may request the restriction of the 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 to have it transferred to another controller.
- Right to object (Art. 21 GDPR): You may object to the processing of your data if it is based on Art. 6 (1) (e) or (f) GDPR.
- Right to withdraw consent (Art. 7(3) GDPR): You may withdraw your consent at any time, thereby prohibiting future processing based on this consent. This does not affect the lawfulness of processing based on consent before its withdrawal.
- Right to lodge a complaint (Art. 77 GDPR): You can lodge a complaint with a data protection supervisory authority, e.g., the Bavarian State Office for Data Protection Supervision (BayLDA), Promenade 18, 91522 Ansbach, email: poststelle@datenschutz-bayern.de.

13. Cookies

Cookies are small text files that are stored on your data carrier by the browser you use with a specific character string. This storage provides the issuing body with certain information. Cookies are not technically capable of executing programs or transferring malware to your device, which is why they pose no danger. They are used to improve the user-friendliness and efficiency of our online offering. Cookies may contain information that enables the device used to be identified. Other cookies only store non-personal configuration settings. It is not possible to directly identify the user through cookies.

Cookies are classified according to their storage duration (temporary session cookies vs.

permanent cookies) and their functionality:

- Technical cookies: These are essential for navigation and basic functionality of our website and ensure its security. They do not collect marketing information or log your browsing history.
- Performance cookies: These collect pseudonymous data about your use of our website, subpages visited, and any malfunctions. They are used exclusively to optimize our offering and analyze user interests.
- Advertising and targeting cookies: These enable the provision of personalized advertising on our website or by third-party providers, as well as the measurement of the success of such offers. The maximum storage period is 13 months.
- Interaction cookies: These improve the communication of our website with external services (e.g., social networks). Here, too, the maximum storage period is 13 months.

Any use of cookies that is not technically necessary constitutes a processing operation relevant to data protection law, which is only permissible with your express and active consent in accordance with Art. 6 (1) (a) GDPR. This applies in particular to advertising, targeting, and interaction cookies. The personal data processed by cookies will also only be passed on to third parties with your express consent in accordance with Art. 6 (1) (a) GDPR. You can revoke this consent at any time via our cookie management system.

Rare exceptions are cookies whose use is otherwise justified by Art. 6 (1) (b)-(f).

14. Updating the privacy policy

In the course of further developments in data protection law and technological or organizational changes, we regularly review our privacy policy to determine whether adjustments are necessary. Changes will be announced in particular on our website at www.airadoc.de. This privacy policy is current as of September 2025.

B. Marketing websites

1. Functional description

Information about our company and the services we offer can be found in particular at www.airadoc.com and the associated subpages (hereinafter collectively referred to as "marketing websites"). When you visit our marketing websites, your personal data may be processed.

2. Processed personal data

Insofar as the processing mentioned below is based on Art. 6 (1) (f) GDPR, the purposes mentioned also represent our legitimate interests.

a. Informational use

The following processing of personal data occurs when our marketing websites are used for purely informational purposes.

Log data

- Context and scope

Each time our marketing websites are accessed, a temporary and pseudonymized log data record (so-called server log files) is stored, which contains the following information:

- Referrer URL (the page from which the request came)
- 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 (pseudonymized)
- Amount of data transferred
- Operating system

- Access status/HTTP status code
- GMT time zone difference
- Purpose and legal basis
The processing of log data serves statistical purposes and the improvement of 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 the operation of our website and the processing of stored data (e.g., data centers, IT security). Furthermore, A.11 applies.
- Transfer to third countries
Data may be transferred to Hotjar's subcontractors for analysis purposes and to Framer for hosting. More detailed information and the legal classification of the transfer can be found in Appendix 2.

Cookies

- Context and scope

Name	Domain	Storage period	Category	Description
hjSessionUser	airadoc.com	12 months	Service	Assignment of the user to an ID (Hotjar)
_ga	airadoc.com	13 months	Performance	Assignment of the user to an ID (Google Analytics)
ga<property_id>	airadoc.com	13 months	Performance	Assignment of the user to a property ID (Google Analytics)
fs-consent-*	airadoc.com	1 month	Technically necessary	Storage of 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
For performance cookies, our processors for analytics. For the cookie "_hjSessionUser_" these are Hotjar and its processors. For the cookies "_ga" and "_ga_<property_id>," these are Google and its processors. More detailed information and the legal classification of the transfer can be found in Appendix 1.
- Transfer to third countries
The transfer of personal data to third countries takes place for the cookies "_hjSessionUser_", "_ga" and "_ga_<property_id>" to Google (Analytics) and, if applicable, to Hotjar's sub-processors. More detailed information and the legal classification of the transfer can be found in Appendices 1 and 2. The data may be transferred to Hotjar's subcontractors for analysis purposes and to Framer for hosting. More detailed information and the legal classification of the transfer can be found in Appendix 2.

b. Contact

As soon as you use our contact form to send us a contact request, the following processing of personal data will take place.

Contact form data

- Context and scope
When you use our contact forms, we process the data you provide, such as your last name, first name, email address, and the time of transmission. In addition, any optional personal data provided in your message will also be processed.
- Purpose and legal basis
Contact form data is processed for the purpose of handling your inquiries (legal basis: Art. 6 (1) (b) or (f) GDPR). We process all optional (special) personal data provided in your message on the basis of implied consent in accordance with Art. 6 (1) (a) GDPR or Art. 9 (2) (a) GDPR.
- Duration of processing
A.5 applies.
- Categories of recipients
Processors for the provision of the form, transmission of the message, processing of the stored data, and fulfillment of the tasks incumbent upon us as a result of your request (e.g., data centers, IT security). Furthermore, A.11 applies.
- Transfer to third countries

The data may be transferred to Framer's subcontractors for hosting. More detailed information and the legal classification of the transfer can be found in Appendix 2. In addition, data is transferred to Google (email traffic) and its processors. More detailed information and the legal classification of the transfer can be found in Appendix 1.

3. Final remarks

a. Use of social media

We do not implement any direct social media plugins on our websites. If symbols from social media platforms (such as Facebook, Instagram, or similar services) appear on our website, these serve exclusively as passive references to the respective provider sites.

C. AIRAdoc

1. Function description

Our AIRAdoc software includes functions for AI-supported improvement of everyday working life as a physician. Please refer to the applicable General Terms and Conditions for the specific range of functions, which is also determined by your desired configuration.

2. Processed personal data

Insofar as the processing mentioned below is based on Art. 6 (1) (f) GDPR, the purposes mentioned also represent our legitimate interests. No special categories of personal data are processed. In anonymized form, usage data may be aggregated for marketing purposes.

a. Basic use

Any use of AIRAdoc results in the following processing of personal data.

Log data

- Context and scope
Each time AIRAdoc is accessed, a temporary and anonymized log data record (so-called server log files) is stored, which contains 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 (anonymized)
 - Amount of data transferred
 - Operating system
 - Access status/HTTP status code
 - GMT time zone difference
- Purpose and legal basis
The processing of log data serves statistical purposes and the improvement of 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 the operation of our website and the processing of stored data (e.g., data centers, IT security). Furthermore, A.11 applies.

- Transfer to third countries
None.

Cookies

- Context and scope

Name	Domain	Storage period	Category	Description
i18next	app.airadoc.com	Session	Technically necessary	Storage of 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.
- Transfer to third countries
None.

b. Management of accounts and settings

User profile and user settings

- Context and scope
We request some basic information to create and manage your user account. This includes:
 - First and last name
 - Email
 - Field of study
 - Language
 - Farewell form for doctor's letters
- Purpose and legal basis
This data is processed for the purpose of registering users and fulfilling product functionalities (legal basis: Art. 6 (1) (b) GDPR).
- Duration of processing
A.5 applies.

- Categories of recipients
Processors for the hosting of AIRAdoc. Furthermore, A.11 applies.
- Transfer to third countries
None.

Advertising and product information

- Context and scope
We require some personal data from you in order to send you product information such as usage instructions and tutorials, as well as for advertising purposes. This includes:
 - First and last name
 - Email
 - Field of study
 - Language setting
- Purpose and legal basis
This data is processed for advertising purposes and to send optional product information, and is 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 for the hosting of AIRAdoc. Furthermore, A.11 applies.
- Transfer to third countries
None.

Payment service provider

- Context and scope
We require payment information from you for payment processing.
- Purpose and legal basis
This data is processed exclusively for payment processing (legal basis: Art. 6 (1) (b) GDPR).
- Duration of processing
A.5 applies.
- Categories of recipients
Processors for payment processing by AIRAdoc. Furthermore, A.11 applies.
- Transfer to third countries

Transfers to third countries take place exclusively in the course of transfers to the processor Stripe and its processors for payment processing. More detailed information and the legal classification of the transfer can be found in Appendix 1.

Organizations

- Context and scope
In order to map organizational structures within AIRAdoc, we process the affiliation of various users to an organization and the identification of users as administrators for this organization.
- Purpose and legal basis
This data is processed to fulfill the product functionalities (legal basis: Art. 6 (1) (b) GDPR).
- Duration of processing
A.5 applies.
- Categories of recipients
Processors for the hosting of AIRAdoc. Furthermore, A.11 applies.
- Transfer to third countries
None.

c. Use of the software functions

Feedback function

- Context and scope
You have the option of voluntarily evaluating 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 is processed for the purpose of improving our product (legal basis: Art. 6 (1) (f) GDPR).
- Duration of processing
A.5 applies.
- Categories of recipients
Processors for the hosting of AIRAdoc. Furthermore, A.11 applies.
- Transfer to third countries
None.

Creation and use of audio recordings, documents, and templates

- Context and scope

Within the scope of the intended use of AIRAdoc, the user regularly shares personal data that is absolutely necessary for the fulfillment of the product functionalities.

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 apply at both the user and organizational levels.

- Purpose and legal basis

This data is processed for the purpose of fulfilling product functionalities (legal basis: Art. 6 (1) (b) GDPR).

- Duration of processing

A.5 applies.

- Categories of recipients

Processors for the hosting of AIRAdoc. Furthermore, A.11 applies.

- Transfer to third countries

None.

Use of the PV module

- Context and scope

Within the scope of the intended use of the PV module of AIRAdoc, the user regularly shares personal data. This includes, among other things:

- Information about the use
- Saving and commenting on references
- Creating search queries and chat histories

- Purpose and legal basis

This data is processed for the purpose of fulfilling the product functionalities of the PV module (legal basis: Art. 6 (1) (b) GDPR) and for certification and security checks for the cooperation partner Prof. Valmed® - certified medical information GmbH (legal basis: Art. 6 (1) (f) GDPR).

- Duration of processing

A.5 applies.

- Categories of recipients

Processors for the hosting of AIRAdoc and the cooperation partner Prof. Valmed® - certified medical information GmbH. Furthermore, A.11 applies.

- Transfer to third countries

For third-country transfers by our cooperation partner Prof. Valmed® - certified medical information GmbH, please refer to Appendix 3. More detailed information and the legal classification of the transfer can be found in Appendix 1.

- Joint responsibility

Within the scope of the "PV" module, there is joint responsibility between us and Prof. Valmed® - certified medical information GmbH. For further information, please refer to Appendix 3.

d. Data processing for certification and security checks

- Context and scope

The certification of AIRAdoc in accordance with the Medical Devices Regulation (EU) 2017/745 requires the processing of your personal data. The data processed is:

- Feedback data

- Purpose and legal basis

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

- Duration of processing

Legally prescribed processing periods for certification.

- Categories of recipients

Processors for the hosting of AIRAdoc. Furthermore, A.11 applies.

- Transfer to third countries

None.

Appendix 1 – Overview of processors outside the EEA

Below you will find a list of all processors outside the EEA, their location, and the legal basis for the transfer of personal data to this processor. If the legal basis for a processor is an adequacy decision, you will find it at

http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.html.

The list also includes all processors whose services are used by the processors. Corresponding cross-references can be found in the entries for the individual processors.

- Google
 - Company name: Google LLC
 - Company headquarters: Mountain View, California, USA
 - Processing activities used: Email delivery
 - Legal basis: Certification pursuant to Art. 45 (1) GDPR within the framework of the Data Privacy Framework. For more information on certification, see [Data Privacy Framework](#).
- Stripe
 - Company name: Stripe, Inc.
 - Headquarters: South San Francisco, California, USA, and Dublin, Ireland
 - Processing activities used: Payment processing
 - Legal basis: Certification pursuant to Art. 45 (1) GDPR within the framework of the Data Privacy Framework. For more information on certification, see [Data Privacy Framework](#).

Appendix 2 – Overview of processors within the EEA

Below is a list of all processors within the EEA. It is possible that these processors use sub-processors in third countries. In this case, this is contractually secured in accordance with Art. 28 GDPR.

- Hotjar
 - Company name: Hotjar Ltd.
 - Company headquarters: Malta
 - Processing activities used: Analysis of user behavior on our marketing websites
- Framer
 - Company name: Framer B.V.
 - Company headquarters: Amsterdam, Netherlands
 - Processing activities used: Creation and hosting of our marketing websites
- Telekom
 - Company name: Telekom Deutschland GmbH
 - Company headquarters: Bonn, Deutschland
 - Processing activities used: Hosting of the AIRAdoc product

Appendix 3 - Joint responsibility with Prof. Valmed® - certified medical information GmbH

Information on the joint responsibility of AIRAdoc GmbH ("AIRAdoc GmbH") and Prof. Valmed® - validated medical information GmbH ("PV") pursuant to Art. 26 (2) sentence 2 of the General Data Protection Regulation (GDPR) for customers of AIRAdoc GmbH as data subjects

Who are the joint controllers?

AIRAdoc GmbH (AIRAdoc GmbH)
Am Biopark 13
93053 Regensburg

Prof. Valmed® - validated medical information GmbH (PV)
Fasanenweg 2
63225 Langen

Who are the respective data protection officers?

Jonathan Bollig (Data Protection Officer at AIRAdoc GmbH)
Am Biopark 13
93053 Regensburg
datenschutz@airadoc.com

Prof. Valmed® - validated medical information GmbH (Data Protection Officer PV)
Fasanenweg 2
63225 Langen
profvalmed@profvalmed.com

What is the reason for joint responsibility?

The parties work closely together within the framework of their cooperation agreement for the provision of PV services as part of the AIRAdoc product from AIRAdoc GmbH. This also applies to the processing of your personal data. The parties have jointly determined the sequence of processing this data in the individual process stages. They are therefore jointly responsible for the protection of your personal data within the process stages described below (Art. 26 GDPR).

What have the parties agreed?

Within the scope of their joint responsibility for data protection, the parties have agreed which of them will fulfill which obligations under the GDPR. This applies in particular to the exercise of the rights of the data subjects and the fulfillment of the information obligations pursuant to Articles 13 and 14 GDPR.

This agreement is necessary because when using the PV module of the AIRAdoc product, personal data is processed in different process stages and systems operated by one of the parties.

What does this mean for you as a data subject?

Even if joint responsibility exists, the parties fulfill their data protection obligations in accordance with their respective responsibilities for the individual process stages as follows:

The data subjects in the following data processing operations are the customer of AIRAdoc GmbH ("doctor") and their patients ("patients").

Recording of data in AIRAdoc and forwarding to PV

Type of processing: Collection, recording, modification

Purpose: Use of the "PV" module of AIRAdoc in accordance with the service description

Legal basis: Consent (Art. 6 (1) (a) and Art. 9 (2) (a) for patients and fulfillment of contractual obligations and legitimate interests (Art. 6 (1) (b) and (f) for doctors

Data categories: Health data, social data, master data of patients, as well as user and usage data of physicians (pseudonymized user token, specialty, language, client/instance ID, timestamp, request metadata, technical identifiers) and conversation data of patients and physicians

Responsible controller: AIRAdoc GmbH in joint responsibility with the customer of AIRAdoc GmbH

Duration: 90 days after initial collection of the data or until manual deletion by the customer of AIRAdoc GmbH

Generation of AI-supported recommendations for action and clinical information

Type of processing: Organization, sorting, storage, reading, querying, modification, use, deletion

Purpose: Use of the "PV" module of AIRAdoc in accordance with the service description

Legal basis: Legal basis: Consent (Art. 6 (1) (a) and Art. 9 (2) (a) for patients and consent and fulfillment of contractual obligations (Art. 6 (1) (a) and (b) for physicians

Data categories: Health data, social data, master data of patients, and consultation data of patients and physicians

Responsible party: Party 2

Duration: 90 days

Display and use of information provided by PV

Type of processing: Organization, arrangement, storage, retrieval, consultation, use, deletion

Purpose: Use of the "PV" module of AIRAdoc in accordance with the service description

Legal basis: Consent (Art. 6 (1) (a) and Art. 9 (2) (a) for patients and consent and fulfillment of contractual obligations (Art. 6 (1) (a) and (b) for physicians

Data categories: Health data, social data, master data of patients, as well as user and usage data of physicians and conversation data of patients and physicians

Responsible controller: AIRAdoc GmbH in joint responsibility with the customer of AIRAdoc GmbH

Duration: Until manual deletion by the customer of AIRAdoc GmbH

Certification and quality management of PV

Type of processing: Organization, sorting, storage, reading, retrieval, use, deletion

Purpose: Security and legal compliance of the PV product

Legal basis: Consent (Art. 6 (1) (a) and Art. 9 (2) (a) for patients and consent and fulfillment of contractual obligations (Art. 6 (1) (a) and (b) for doctors

Data categories: Health data, social data, master data of patients, user and usage data of physicians, and conversation data of patients and physicians

Responsible party: Party 2

Duration: 90 days and long-term storage of non-personal data for quality assurance purposes

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- AIRAdoc GmbH will provide you with the relevant information free of charge in accordance with Art. 13 and 14 GDPR.

- Data protection rights can be asserted both at AIRAdoc GmbH and at PV. You will generally receive feedback from the entity where you asserted your rights. To this end, each party will provide the other with all necessary information from its part of the process.

What processing by processors and what third-country transfers of your data take place?

Please refer to the list of processors of AIRAdoc GmbH at www.airadoc.com and the information provided by PV for this information.