



Privacy policy

23rd January 2025 (version 1) - based on DSAT.ch. – This is a translated version. In case of doubt, the original German version shall always supersede this.

In this privacy policy, we, Osteopathie Seebach GmbH (hereinafter: the clinic), explain how we collect and otherwise process personal data. This is not an exhaustive description. Amongst the following also apply

- the data protection concept,
- the information on the registration form for patients,
- the information sheet on the handling of personal data for patients and
- the regulations on the use of the clinic's information and communication technology

Personal data refers to all information relating to an identified or identifiable person.

If you provide us with personal data of other persons (e.g. family members, data of work colleagues), please make sure that these persons are aware of this privacy policy and only share their personal data with us if you are authorised to do so and if this personal data is correct.

This Privacy Policy is designed to meet the requirements of the EU General Data Protection Regulation ("GDPR"), the Swiss Data Protection Act ("DSG") and the revised Swiss Data Protection Act ("revDSG"). However, whether and to what extent these laws are applicable depends on the individual case.

1. Data protection officer Person of the clinic

Mia Macdonald, Osteopathie Seebach GmbH, Birchstrasse 650, CHE-8052 Zurich (mia.macdonald@osteo-hin.ch) is responsible for the data processing that we carry out here-unless otherwise stated in individual cases. If you have any data protection concerns, you can inform us there. This is also the address of our data protection officer in accordance with Art. 37 GDPR.

2. Collection and processing of personal data

We primarily process the personal data that we receive from our patients and other business partners as part of our business relationship with them and other persons involved or that we collect from their users when operating our websites, apps and other applications.

Insofar as this is permitted, we also obtain certain data from publicly accessible sources (e.g. debt collection registers, land registers, commercial registers, press, Internet) or receive such data from authorities and other third parties (such as credit reference agencies, etc.). In addition to the data that you provide to us directly, the categories of personal data that we receive



about you from third parties include, in particular, information from public registers, information that we learn in connection with official and legal proceedings, information in connection with your professional functions and activities (so that we can, for example to conclude and process transactions with your employer with your help), information about you in correspondence and meetings with third parties, creditworthiness information (insofar as we process transactions with you personally), information about you that people from your environment (family, advisors, legal representatives, etc.) provide to us so that we can conclude or process contracts with you or with your involvement (e.g. references, your address for deliveries, full addresses, etc.). references, your address for deliveries, powers of attorney, information on compliance with legal requirements such as anti-money laundering and export restrictions, information from banks, insurance companies, sales and other contractual partners of ours on the utilisation or provision of services by you (e.g. payments made, purchases made, services used), information from the media and Internet about your person (insofar as this is appropriate in the specific case, e.g. in the context of an application, press releases, etc.) e.g. in the context of an application, press review, marketing/sales, etc.), your addresses and, if applicable, interests and other socio-demographic data (for marketing), data in connection with the use of the website (e.g. IP address, MAC address of the smartphone or computer, information about your device and settings, cookies, date and time of the visit, pages and content accessed, functions used, referring website, location data)

3. Purposes of data processing and legal basis

We primarily use the personal data we collect to conclude and process our contracts with our patients and business partners, in particular in the context of providing healthcare services to patients and trading in healthcare products. Where necessary, the data is also used to purchase products and services from our suppliers and subcontractors and to fulfil our legal obligations in Switzerland and abroad. If you work for a business partner, your personal data may of course also be affected in this capacity.

In addition, we also process personal data of you and other persons for the following purposes, where permitted and where we deem it appropriate, in which we (and sometimes third parties) have a legitimate interest corresponding to the purpose

- Offering and further developing our products, services and websites, apps and other platforms on which we are present;
- Communication with third parties and processing their enquiries (e.g. applications, media enquiries);
- Examination and optimisation of procedures for needs analysis for the purpose of direct customer contact and collection of personal data from publicly accessible sources for the purpose of customer acquisition



- Advertising and marketing (including the organisation of events), unless you have objected to the use of your data (if we send you advertising from us as an existing customer, you can object to this at any time and we will then put you on a blacklist against further advertising mailings)
- Market and opinion research, media monitoring
- Assertion of legal claims and defence in connection with legal disputes and official proceedings;
- Prevention and investigation of criminal offences and other misconduct (e.g. conducting internal investigations, data analyses to combat fraud);
- Guarantees of our operations, in particular IT, our websites, apps and other platforms;
- Video surveillance to safeguard domiciliary rights and other measures for IT, building and facility security and protection of our employees and other persons and assets belonging to or entrusted to us (e.g. access controls, visitor lists, network and mail scanners, telephone recordings);
- Purchase and sale of business divisions, companies or parts of companies and other transactions under company law and the associated transfer of personal data as well as measures for business management and compliance with legal and regulatory obligations as well as internal regulations in clinic.

If you have given us your consent to process your personal data for specific purposes (for example, when you register to receive newsletters, fill out the registration form for patients or carry out a background check), we will process your personal data within the scope of and based on this consent, unless we have another legal basis and require one. Consent that has been granted can be revoked at any time, but this has no effect on data processing that has already taken place.

4. Cookies / tracking and other technologies in connection with the use of our website

Website analytics

We do not currently collect any usage data on our website using Google Analytics or similar tools.

Server log files

The hosting provider of this website automatically collects and stores information in so-called server log files, which your browser automatically transmits when you access a website. Depending on your device settings, this may include the browser type and version, the operating system used, referrer URL, host name of the accessing device, time of the server request, etc.

Google (Maps, YouTube, Fonts)

This website uses the services of Google (Maps and YouTube). We have configured these elements so that they are deactivated by default. If you activate them (by clicking on them), the respective operator of the services can register that you are on our website and where and

can use this information for their purposes. The processing of your personal data is then the responsibility of these operators in accordance with their data protection regulations.

This website uses so-called web fonts provided by Google for the standardised display of fonts. When you call up a page, your browser loads the required web fonts into your browser cache in order to display texts and fonts correctly. If your browser does not support web fonts, a standard font will be used by your computer. You can find more information about Google Web Fonts at <https://developers.google.com/fonts/faq>

You can find more information on the purpose and scope of data collection and processing by Google as well as further information on your rights in this regard and setting options to protect your privacy at: <https://policies.google.com/privacy>

5. Data transfer and data transmission abroad

As part of our business activities and for the purposes set out in section 3, we also disclose data to third parties to the extent permitted and deemed appropriate, either because they process it for us or because they wish to use it for their own purposes. This applies in particular to the following bodies:

- Service providers of ours (Ärztelasse Genossenschaft, OneDoc), including processors (such as IT providers);
- Dealer: inside, supplier: inside, subcontractor: inside and other business partners: inside;
- Customers;
- domestic and foreign authorities, official bodies or courts;
- Media;
- The public, including visitors to websites and social media;
- Competitors, industry organisations, associations, organisations and other bodies;
- Acquirers or parties interested in acquiring business units, companies or other parts of the clinic
- other parties in potential or actual legal proceedings;
- other companies in the clinic;

all **recipients** together.

Some of these recipients are located in Germany, but they can be anywhere in the world. In particular, you must be familiar with the transmission to other countries in Europe and the USA, where the service providers we use are located (e.g. Microsoft). Particularly sensitive personal data will only be transmitted in accordance with applicable law, the clinic's data protection concept and the regulations on the use of the clinic's information and communication technology.



If a recipient is located in a country without adequate legal data protection, we contractually oblige the recipient to comply with the applicable data protection law (we use the revised standard contractual clauses of the European Commission, which are available here: https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?), unless the recipient is already subject to a legally recognised set of rules to ensure data protection and we cannot rely on an exception. An exception may apply in particular in the case of legal proceedings abroad, but also in cases of overriding public interests or if the fulfilment of a contract requires such disclosure, if you have given your consent or if the data in question has been made generally accessible by you and you have not objected to its processing.

6. Duration of storage of data

We process and store your personal data for as long as is necessary for the fulfilment of our contractual and legal obligations or otherwise for the purposes pursued with the processing, i.e. for example for the duration of the entire business relationship (from the initiation, processing to the termination of a contract) and beyond that in accordance with the statutory retention and documentation obligations. It is possible that personal data may be stored for the period in which claims can be asserted against our company and insofar as we are otherwise legally obliged to do so or legitimate business interests require this (e.g. for evidence and documentation purposes). As soon as your personal data is no longer required for the above-mentioned purposes, it will be deleted or anonymised as far as possible. Shorter retention periods of twelve months or less generally apply to operational data (e.g. system protocols, logs).

7. Data security

We take appropriate technical and organisational security precautions to protect your personal data from unauthorised access and misuse, such as the obligations set out in the duties of the person responsible for data protection, employee training, IT and network security solutions, access controls and restrictions, encryption of data carriers and transmissions, pseudo-anonymisation and controls.

8. Obligation to provide personal data

As part of our business relationship, you must provide the personal data that is necessary for the establishment and implementation of a business relationship and the fulfilment of the associated contractual obligations (as a rule, you do not have a legal obligation to provide us with data). Without this data, we will generally not be able to enter into or fulfil a contract with you (or the entity or person you represent). The website can also not be used if certain information to secure data traffic (such as IP address) is not disclosed.

9. Rights of the data subject

You have the right to information, correction, deletion, the right to restrict data processing and otherwise to **object to our data processing, in particular for the purposes of direct marketing,**



and other legitimate interests in the processing as well as to the surrender of certain personal data for the purpose of transfer to another body (so-called data portability) within the framework of the data protection law applicable to you and insofar as provided for therein (as in the case of the GDPR). Please note, however, that we reserve the right to assert the restrictions provided for by law, for example if we are obliged to store or process certain data, have an overriding interest in doing so (insofar as we are entitled to invoke this) or require it for the assertion of claims. If you incur costs, we will inform you in advance. We have already informed you about the possibility of withdrawing your consent in section 3. Please note that exercising these rights may conflict with contractual agreements and may have consequences such as premature cancellation of the contract or cost consequences. We will inform you in advance if this is not already contractually regulated.

The exercise of such rights generally requires that you clearly prove your identity (e.g. by means of a copy of your ID, where your identity is otherwise not clear or cannot be verified). To assert your rights, you can contact us at the address given in section 1.

Every data subject also has the right to enforce their claims in court or to lodge a complaint with the competent data protection authority. The competent data protection authority in Switzerland is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

10. Droits d'auteur

Les droits d'auteur et tous les autres droits liés aux contenus, images, photos ou autres fichiers figurant sur le site Internet appartiennent exclusivement à l'exploitant de ce site Internet ou aux titulaires de droits spécifiquement cités. Pour la reproduction de tous les fichiers, l'accord écrit du détenteur des droits d'auteur doit être obtenu au préalable.

Toute personne qui commet une violation des droits d'auteur sans l'accord du titulaire des droits peut être punie et éventuellement être tenue de verser des dommages et intérêts.

11. Amendments

We may amend this privacy policy at any time without prior notice. The current version published on our website shall apply. If the privacy policy is part of an agreement with you, we will inform you of the change by e-mail or other suitable means in the event of an update.