

# Privacy Policy

## Information on the collection of personal data at Orthotec AG

Orthotec AG (Orthotec) dedicates its utmost attention to data protection.

This information is intended to show you how we process your personal data at Orthotec and inform you of your rights grounded in data protection law.

The SPG Privacy Policy informs you about data collected via the website.

### 1. Who is responsible for the data processing and who can I contact?

Data processing is the responsibility of:

Orthotec AG  
Guido A. Zäch Strasse 1  
CH-6207 Nottwil

The data protection officer can be contacted at:

Swiss Paraplegic Group  
Information security and data protection officer  
Guido A. Zäch Strasse 1  
CH-6207 Nottwil  
E-mail: [datenschutz@paraplegie.ch](mailto:datenschutz@paraplegie.ch)

### 2. What sources do we use?

We process all of your personal data which we receive from you in the context of the customer relationship or which we receive from the Paraplegic Centre about you with your consent.

We also receive data from you via our online shop and when you subscribe to our newsletter.

As part of an application procedure for a position, you make your personal data available to Orthotec via your application for the purpose of job searching. Your data is processed by the HR department of the Swiss Paraplegic Centre and stored and processed on the systems of our software partner Haufe-umantis AG.

There is the possibility that you will be captured by our surveillance cameras at various public places (e.g. car parks, material handling areas, entrances and exits of SPG buildings) – the places will be marked.

### 3. Which data is collected?

We collect the following information via the online shop: first name, surname, address, telephone number, e-mail address. You also have the option of providing your customer number.

For the Orthotec newsletter, we need your title, first name, surname and e-mail address. You also have the option of providing your company name.

For contractual relationships, such as a business relationship or similar, we collect all data that we need in order to fulfil contractual or legal obligations.

Within the course of an application procedure for a position, the data from the application documents such as your cover letter, CV, professional, educational and training qualifications as well as work references are collected.

Surveillance cameras in high-security places on the Paraplegic Group campus in Nottwil (including car parks) may film you. Facial recognition software is not used.

### 4. Why do we process your data (purpose of processing)?

We process your personal data in accordance with data protection law. We use the data exclusively to process current or future transactions with you. The purpose of the processing is primarily based on the specific product (e.g. vehicle adaptation, incontinence products or rehabilitation technology).

In our business relationships with you as a customer, the data is solely collected for the purpose of the business relationship.

The data collected for an application is stored in the above applicant database and is only stored, evaluated, processed or passed on within the company within the context of your application. It can only be accessed by employees of SPC's HR department and the people at Orthotec responsible for the selection process. Your data will never be passed on to another person or company or used for other purposes.

Video surveillance is used to deny access to the premises to unauthorised persons and to collect evidence in the event of theft and property damage. In the event of criminal offences, property damage, etc., it should also be possible to provide investigating authorities with relevant information which could help to determine the perpetrators.

## **5. Who receives my data?**

Within Orthotec, those bodies that need your data to fulfil our contractual and legal obligations will have access to it. Service providers and vicarious agents can receive data for these purposes if they have signed a non-disclosure agreement.

The company obliges Orthotec employees to keep confidential all facts and evaluations they have gained knowledge of as part of their work. We only pass on information about you without your consent within the context of cost reimbursement clarifications by payers.

The HR department at the SPC is responsible for managing personnel at Orthotec. Applicant data is processed by the SPC HR department and stored and processed on the systems of our software partner Haufe-umantis AG. Secure transfer is ensured with 128-bit encryption.

The data collected from the video surveillance on the Nottwil campus will only be disclosed to third parties on the basis of a legal obligation or for the assertion of a legitimate interest of a Paraplegic Group organisation.

## **6. Is data transferred to a third country?**

Data is never transferred to places outside of Switzerland (so-called third countries) without your consent.

## **7. How long is my data stored for?**

We process and store your personal data for as long as it is required for the fulfilment of our contractual and legal obligations. It is worth noting in this respect that our relationships to you as a customer are a continuing obligation which are intended to last for years.

If the data is no longer necessary for the fulfilment of contractual or legal obligations, it will be erased on a regular basis.

If you are employed at Orthotec, your applicant data will be included in your employee file.

If you applied but were turned down, your information will be erased around 24 months after the application procedure has come to an end. You can delete your profile with your applicant data yourself at any time. You are not informed of the data's erasure. If we want to include your data in a talent pool, we will obtain your explicit consent.

Video recordings of the campus will be automatically deleted after 60 days at the latest. It is only possible to store the videos for longer if this is done so in connection with an assertion of claims.

## **8. What are my data protection rights?**

As a data subject, you have the right to information, inspection, rectification and erasure (not applicable to patient data as this must also be retained in the public interest) as well as to the restriction of processing. You may revoke consent you have given for data processing at any time. Please note that the withdrawal of consent is only effective for the future. Processing executed before the withdrawal is not affected thereby.

The rights of the data subject can be asserted in an informal manner. A request is to be addressed to:

Swiss Paraplegic Group  
Information security and data protection officer

**9. Erasure of data**

The data we store will be erased as soon as it is no longer required for its purpose and the erasure is not in conflict with any legal retention obligations. If the user's data is not erased because it is necessary for other purposes permitted by law, its processing will be restricted. This means that the data is blocked and not used for other purposes. This applies, for example, to user data which must be stored for reasons under trade or tax law.

**10. To what extent is automated decision-making carried out?**

The SPG does not carry out any fully automated decision-making based on the information we have.

**11. Is profiling carried out?**

No profiling is carried out with the data collected via this website.

**12. Security measures**

We take organisational, contractual and technical security measures according to the state of the art to ensure compliance with the provisions of data protection laws and thus protect any data we process from accidental or intentional manipulation, loss, destruction or access by third parties.

**13. Changes to the Privacy Policy**

Changes to this Privacy Policy may be necessary as part of the further development of our websites and the implementation of new technologies. We therefore recommend that you reread this Privacy Policy from time to time.